

Exhibit J

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB

REPORT OF THOMAS R. TREMBLAY

This Report relates to the following Wave 1 Cases:

**Case No. 24-cv-7940 (B.L.)
Case No. 24-cv-7821 (A.R.2)
Case No. 24-cv-7019 (LCHB128)
Case No. 23-cv-6708 (Dean)
Case No. 24-cv-4900 (WHB 832)**

SEPTEMBER 26, 2025

Confidential- Subject to Protective Order

Case Info: *In re: Uber Technologies, Inc. Litigation*

Uber MDL 3:23-MDL-03084

Report by Thomas R. Tremblay

The author has been retained by Counsel as a subject matter expert to render opinions regarding public safety accountability and sexual assault and sexual misconduct prevention in this matter, which are set forth more fully below.

I. Summary of Opinions:

For the detailed reasons stated in this report and the attachments, I intend to offer the following opinions in this case based on my knowledge, education, training and experience to a reasonable degree of professional certainty:

1. Was sexual assault, and/or sexual misconduct by Uber drivers on Uber riders foreseeable to Uber? It is more likely than not that sexual assault, and/or sexual misconduct by Uber drivers on Uber riders was foreseeable.

2. Could Uber have prevented or substantially reduced the risk of an Uber rider being subjected to sexual assault, and/or sexual misconduct by an Uber driver on the Uber platform? It is more likely than not that Uber could have taken additional steps to prevent or substantially reduce the risk of an Uber rider being subjected to sexual assault, and/or sexual misconduct.

3. Did Uber's conduct increase the risk that an Uber rider would be subjected to sexual assault, and/or sexual misconduct by an Uber driver on the Uber platform? It is more likely than not that Uber's conduct increased the risk that an Uber rider would be subjected to sexual assault, and/or sexual misconduct by an Uber driver.

4. Public awareness and engagement is an important step in prevention. Despite Uber's historical "commitment to safety," and Uber's assurance that "safety is our priority," Uber has not publicly communicated or warned potential riders/consumers of the totality and prevalence of sexual assault / misconduct committed by Uber drivers against Uber riders on the Uber platform. It is more likely than not that this position has compromised Uber's stated commitment to safety, limited rider/consumer prevention efforts, and put riders/consumers at greater risk of Uber drivers committing sexual assault / misconduct against Uber riders. Eliminating misleading assurances of safety, and warning potential riders/consumers of the totality and prevalence of sexual assault / misconduct on the Uber platform, is more likely than not to enhance the prevention of and safety on the Uber platform.

5. Despite Uber's historical "commitment to safety," and Uber's assurance that "safety is our priority," Uber has not publicly communicated or warned potential riders/consumers, nor have they fully acted upon, the high-risk factors, including when a female rider is riding alone with a male driver, being picked up near a bar, time of trip, day of week, intoxicated rider, drivers' history of feedback, rider in front seat, limited driver and/or rider history, driver had one-star ratings and/or previous safety incidents that they have identified increase the risk of sexual assault / misconduct on the Uber platform. It is more likely than not that Uber's failure in this regard has compromised Uber's stated commitment to safety, limited rider/consumer prevention efforts, and put Uber riders at greater risk of an Uber driver committing sexual assault/ misconduct on the Uber platform. Eliminating misleading assurances of safety, and warning potential rider/consumers of the actual identified high-risk factors, and fully acting upon these factors, is likely to reduce the identified risk factors and enhance the safety of Uber riders on the Uber platform.

6. Uber can reduce known risk of sexual assault / misconduct on the Uber platform by fully implementing effective Response strategies and tools like video and/or audio recording, women to women pairing, adequate education on sexual assault and not matching risky drivers to riders especially when the ride involves high-risk sexual assault factors that Uber identified, Uber had available, or was aware of. It is more likely than not that this position has put Uber riders at greater risk of experiencing sexual assault / misconduct committed by an Uber driver on the Uber platform.

7. The basics of the Crime Prevention / Problem Analysis Triangle recognize that crimes occur when three elements exists: Ability, Desire, and Opportunity, or similarly Location, Offender, and Target/Victim. Crime prevention and problem-solving efforts are enhanced with community engagement in the development of multidimensional and informed strategies directed at removing, or reducing, any one of the three elements. Essentially, Uber controls all three of these elements and has the opportunity educate, influence and monitor all three elements.

8. In addition to these generally applicable opinions, I offer the opinions with respect to the Plaintiffs at issue in this case specifically, who are identified in the attached Schedule A's along with the case-specific bases and reasons for them.

II. Qualifications:

9. I served thirty years as a law enforcement officer in several positions including police officer, detective, sexual assault investigations unit director, supervisor, police chief, and state public safety commissioner. In all of these positions, I was responsible for serving the community, addressing and preventing crime and disorder, investigating criminal behavior, and enforcing the law, including the crimes of sexual assault. I retired as Chief of Police from Burlington, Vermont in 2008, and was appointed by the Governor of the State of Vermont as the state Public Safety Commissioner from 2008 – 2011.

10. As Police Chief I was responsible for law enforcement and public safety services for the city of Burlington, VT and the Burlington International airport. I reported directly to the

Mayor and the Burlington Police Commission where I was responsible for leadership, management and supervision of a department of 140 employees with a budget totaling \$12M.

11. As State Public Safety Commissioner, I was a direct report and advisor to the Governor on public safety, homeland security, and legislative issues, including work with the Vermont Legislature on statewide public safety initiatives. I was responsible for leadership supervision, and management of the Department of Public Safety; Vermont State Police; Vermont Homeland Security; Emergency Management; Fire Safety, and Criminal Justice Services including the Vermont Crime Information Center, Sexual Offender Registry, and Forensic Crime Lab. I had oversight of 600 employees providing statewide public safety services, including special response teams, with a budget totaling \$98M.

12. Some of the specialized assignments during my career included sexual assault investigator, director of a sexual assault investigations unit, internal affairs investigator, and internal affairs director. As deputy chief of police, police chief, and state public safety commissioner, I was responsible for the oversight of hiring decisions including the review of background investigations to ensure high standards, ethics, and qualifications for law enforcement positions. I was also responsible for oversight of internal affairs which included both administrative and criminal investigations of reported misconduct by law enforcement personnel, and the administration of employee discipline.

13. In 2007, during my law enforcement career, I began working with the International Association of Chiefs of Police (IACP) as a selected faculty member of the National Law Enforcement Leadership Initiative on Violence Against Women. This institute focuses on developing leadership skills for the prevention and enhanced accountability for crimes that disproportionately impact women, with emphasis on domestic violence, sexual assault, stalking, and human trafficking.

14. The IACP is described as: “the world’s largest and most influential professional association for police leaders, committed to advancing the safety of communities worldwide.”¹ I am a lifelong member of IACP.

15. My consulting and training work with the IACP focused on leadership strategies for prevention, accountability, and reforms, for effective response to violence against women crimes including sexual assault, other forms of gender-based violence, gender bias prevention in response to sexual assault and domestic violence, and early warning signs for prevention and accountability for police perpetrated domestic violence and sexual assault / misconduct.

16. This work has included consulting, training and peer-review on the development and delivery of training curriculums, national publications and training films, case studies, and the development of law enforcement agency and community assessment tools specific to domestic and sexual violence prevention and accountability².

¹ The International Association of Chiefs of Police, About the IACP, <https://www.theiacp.org/about-iacp>

² See materials available at: [Police Response to Violence Against Women - VAW | International Association of Chiefs of Police](#)

17. Some of these resources included the nationally distributed peer-reviewed guidebook published by the IACP, Sex Offenders in the Community: Enforcement and Prevention Strategies Guidebook.³ One purpose of this guidebook is to provide prevention strategies with regard to sexual offenders. I also contributed to and participated in the production of a peer-reviewed national training video and guidebook entitled “Bringing Sexual Assault Offenders to Justice.”⁴

18. Since my law enforcement retirement in 2011, I started my own consulting and training business that focuses on leadership, reforms, and prevention for sexual assault, domestic violence and other crimes involving gender-based violence.

19. I have provided consultation and training to law enforcement, victim advocates, prosecutors, higher education, the military, communities, governments, regulatory agencies, and private sector businesses. I have engaged in over 400 consultation and training projects, throughout the United States, Canada, and most recently Romania.

20. I am a subject matter expert focusing on reforms for prevention, leadership and response to sexual assault and domestic violence, and other crimes involving gender-based violence, including gender bias prevention strategies in police response to sexual and domestic violence. I am an advisor for numerous organizations including the International Association of Chiefs of Police (IACP), the Police Executive Research Forum, Alliance for Hope International, End Violence Against Women International (EVAWI), the Conference on Crimes Against Women, the Rape Abuse Incest National Network (RAINN), Research Triangle Institute (RTI) International Sexual Assault Kit Initiative, the U.S. Department of the Interior, and U.S. Department of Justice (US DOJ) Civil Rights Division (CRD), and Office on Violence Against Women (OVW).

21. My consulting work with RAINN from 2014-2017 was to assist RAINN in the development of safety and security policies, procedures and training for a RAINN certification process for the cruise line industry specific to child sexual abuse and adult sexual assault prevention, response and investigations. This work included inspections and assessment of individual ship’s efforts for prevention, response and investigation.

22. I served as a Reviewer / Independent Monitor for the US DOJ CRD agreements with Missoula Montana Police Department and the University of Montana Police Department, following US DOJ CRD findings of unlawful gender discrimination in police and prosecutorial response to sexual assault reports. Based on my oversight work in Missoula, MT, I recommended, and the US DOJ CRT agreed, that the City Police and the University of Montana Police had achieved full compliance with their respective agreements. The US DOJ CRD cited the efforts and reforms to address sexual assault in Missoula as a model for the nation.

23. I provide litigation consultant services for the US DOJ CRD as a subject matter expert for investigations of unlawful gender discrimination by law enforcement agencies in

³ <https://www.theiacp.org/resources/sex-offenders-in-the-community-enforcement-and-prevention-strategies-for-law-enforcement> (September 2007).

⁴ [Bringing Sexual Assault Offenders to Justice Roll-Call Training Video](#)

response to domestic violence and sexual assault, including police perpetrated domestic violence and sexual assault / misconduct.

24. In addition to my work in Missoula MT, I have been involved in U.S. DOJ investigations, litigation consultation, and/or resulting training initiatives in New Orleans, LA, Chicago, IL, New York City, NY, Louisville, KY, Worcester, MA, and Baltimore, MD.

25. I assist the U.S. DOJ CRD and OVW with promoting their 2015, and updated 2022, guidance to prevent gender bias and discrimination in police response to sexual assault and domestic violence.

26. I have spent considerable time throughout my law enforcement and consulting career staying current on prevention, accountability, and public safety specifically to sexual assault. As part of my consulting and training, I am involved in the review of ongoing cases, and asked to advise and guide investigators, law enforcement agencies, prosecutors, regulatory agencies, and communities in efforts to reform response, investigation, and prosecution of these cases, ultimately designed to enhance prevention and public safety strategies.

27. Throughout my law enforcement career, and my time as a consultant and trainer, I have practiced and remained current with public safety and crime prevention methods and strategies. The tenants of the Crime Prevention / Problem Analysis Triangle, Community Oriented Policing, Problem Oriented Policing / SARA Model of Problem Solving for reduction of crime and disorder, Crime Prevention Through Environmental Design, and Data Driven Policing models have guided me throughout my entire career.

28. Since 2015 public safety and crime prevention guidance has evolved to include the 21st Century Policing Initiative that identifies best policing practices and offers recommendations on how those practices can promote effective crime reduction while building public trust.

29. I hold a Bachelor's Degree in Criminal Justice / Professional Studies. I am a graduate of the 183rd Session of the FBI National Academy, the FBI Law Enforcement Executive Development Seminar, the Police Executive Research Forum-Senior Management Institute for Police, and the International Association of Chiefs of Police National Law Enforcement Leadership Institute on Violence Against Women.

30. My experience, training and background is outlined in my Curriculum Vitae which outlines my 30-year law enforcement career, and my 14-year consulting and training experience, including a summary of consultation and training projects, in Exhibit A.

31. I have applied my professional experience and knowledge, incorporating the references/resources that explain the concepts I have relied upon throughout my career as identified in Exhibit B, to offer input and opinions regarding this matter.

32. I reserve the right to amend the report and the opinions based on the submission of additional materials and documents, which may influence opinions, or allow for different conclusions. In the absence of any further submissions, or in the appearance of documents that

merely reinforce what has already been submitted, the opinions would stand as stated and presented in this report. The opinions in this report are based on a degree of professional certainty and on a more likely than not basis.

III. Assignment and Scope of Opinions

Plaintiffs' counsel asked me to provide a public safety and crime prevention analysis of sexual assault / sexual misconduct occurring on the Uber platform. Counsel specifically asked me to address and opine on these questions:

- A. Was sexual assault, and/or sexual misconduct by Uber drivers on Uber riders foreseeable to Uber?**
- B. Could Uber have prevented or substantially reduced the risk of an Uber rider being subjected to sexual assault, and/or sexual misconduct by an Uber driver on the Uber platform?**
- C. Did Uber's conduct increase the risk that an Uber rider would be subjected to sexual assault, and/or sexual misconduct by an Uber driver on the Uber platform?**

IV. Methodology

To arrive at my opinions in this case, I have applied the same methodology as in my thirty years of experience in the field of law enforcement and fourteen years of experience in the related field of criminal justice studying, investigating and consulting about crimes and crime prevention including crimes of sexual assault and sexual misconduct. My methodology mirrors the generally accepted analysis adopted by organizations, federal and state agencies and regional and local law enforcement departments where I have executed such analysis. I began by framing questions asked, evaluated and gathered comprehensive evidence, organized my findings, and then developed conclusions across multiple sources of information.

I applied this methodology to review Uber's internal records, comparing its policies and actions to recognized standards and theories of public safety and crime prevention. I undertook a review of the evidence and relevant literature to arrive at my opinions set forth in this report.

I had access to more than two million documents produced in this case by Uber, plaintiffs and third parties. With regard to my case-specific opinions set forth in Schedule A, I had access to the case-specific materials produced by Uber, plaintiffs and third parties. As I identified relevant topics, I searched for more information about those topics. In addition, I repeatedly asked the plaintiffs' lawyers to send me deposition transcripts, exhibits and additional documents and videos as they became available, which I reviewed. I continued to test the themes that I identified against new evidence to determine whether the initial patterns and themes were valid, and I re-examined the documents that I previously read to re-test the themes I identified early in the process. The materials that I considered in support of my opinions are identified in Exhibit B and also identified in Schedule A. Specific citations in the body of this report are meant to be illustrative examples and should not be considered an exhaustive list.

In addition to my consideration of all of these materials, I also considered and applied, where appropriate, the tenants of the Crime Prevention / Problem Analysis Triangle Theory, Community Oriented Policing, Problem Oriented Policing / SARA Model of Problem Solving for reduction of crime and disorder, Crime Prevention Through Environmental Design, and Data Driven Policing models to this case. I explain my application in detail below.

My conclusions are limited to the materials considered in this matter to date. If new evidence or testimony becomes available, I reserve the right to supplement or amend my opinions. All of my opinions are to a reasonable degree of professional certainty.

V. Background

- A. Uber is a transportation company headquartered in San Francisco, CA. beginning in 2009, that pioneered and developed an App-based transportation system that has evolved and been implemented around the world, including across the entire United States. According to Uber's website: "fun facts," Uber operates in 65 countries, and 600 cities worldwide.
- B. Uber's website; "about us," promotes the idea of "reimagining the way the world moves for the better," by leveraging their advanced technology to quickly and conveniently connect drivers with riders on demand.
- C. The Uber website, "a quick guide to Uber," explains how the Uber app works to connect drivers and riders on demand:
 - "Getting Started: The rider enters their destination into the 'Where to?' or 'Dropoff location' box, reviews each ride option, makes their selection, and confirms the pickup." "Matching rider and driver: A nearby driver accepts the rider's ride request. The rider is automatically notified as the driver gets close."
 - "Picking up: The driver and the rider verify each other's names and the destination. Then the driver starts the ride."
 - "Taking the trip: The app gives the driver the option to access turn-by-turn directions."
 - "Leaving ratings and reviews: At the end of each trip, drivers and riders can rate each other from 1 to 5 stars. Riders also have the option to tip directly in the app or online. And in some countries, riders can choose to give their driver compliments."
- D. Today's Uber website and mobile application explains Uber's current "commitment to safety," which also lists several safety features. These safety features include: in-app safety information, Driver screening and background checks – "All drivers are background checked," (drivers) "must undergo a multi-step safety screen including being checked for impaired driving and violent offenses," RideCheck technology that uses "sensors and GPS data," auto insurance

protection, 24/7 Uber Support and 911 emergency contact capabilities, ensuring personal details stay private,⁵ and a Public Safety Team Liaison and Portal – “because safety is our priority,” as stated in their Public Safety portal educational video.⁶

- E. Other emphasis on safety on the Uber website includes information on the following topics:
- “Rider Safety Information:” “Ride with confidence: The Uber platform was built with safety in mind.”⁷
 - “Women’s Safety:” “Safety features built into every ride. We’re dedicated to building a platform where women feel safe. That’s why we partner with and learn from women who use our app, women’s safety experts, and advocates to build innovative safety features and policies that empower our community of users.”⁸
 - The women’s safety section also includes Community Guidelines that “prohibit sexual assault / misconduct” and “tips that promote safety and prevent sexual assault.”⁹
 - Uber asserts that they have created community partnerships, “Meet some of Our Community Partners: We’ve collaborated with many organizations dedicated to raising awareness, offering resources, and fighting the proliferation of violence against women.”¹⁰ This section provides links to seven well respected organizations that I am familiar with, all of which work to increase awareness designed to prevent / end sexual and domestic violence, and violence against women generally.
- F. Uber’s current and historical public message is: “commitment to safety,” “safety is our priority,” “safety is our top priority,” and “it is our goal to make every ride safe, comfortable, and reliable.”
- G. The safety message is of course an important message for Uber Riders/consumers to hear to relieve any concerns about connecting drivers with Riders, or in other words putting complete strangers in a vehicle together under a variety of different circumstances, with many concerning environmental and situational factors. Trusting Uber’s safety message for Riders/consumers is critical for business growth and success.

⁵ [Safety | Uber](https://www.uber.com/us/en/safety/?uclick_id=5b6f0f95-cafe-47aa-9620-ffa81126b2c4) - https://www.uber.com/us/en/safety/?uclick_id=5b6f0f95-cafe-47aa-9620-ffa81126b2c4

⁶ Uber Law Enforcement and Public Health Portal Website - https://lert.uber.com/s/?language=en_US.

⁷ Is Uber Safe for Riders - Uber Website - https://www.uber.com/us/en/ride/safety/?uclick_id=7d791bfb-c303-41a3-af0b-deb019cf134c

⁸ Women's Safety - Uber Website - https://www.uber.com/us/en/safety/womens-safety/?uclick_id=7d791bfb-c303-41a3-af0b-deb019cf134c

⁹ *Id.*

¹⁰ *Id.*

- H. As part of my efforts to stay current in my field of expertise, and as explained in more detail above, I routinely follow credible national and international news stories regarding sexual assault, unfolding sexual assault cases and outcomes, sexual assault trends, offender behaviors and course of conduct, and the institutional and government response to these events. I am generally aware that for approximately the past ten to eleven years sexual assault reports occurring as part of rideshare services made national and international news. Part of that news has included coverage of numerous criminal cases involving rideshare companies, and pending civil lawsuits brought against Uber, questioning Uber's liability as it relates to sexual assaults occurring during Uber rideshare services.
- I. Through the years, Uber has been aware of safety concerns specific to sexual assault committed by Uber drivers against Uber Riders on the Uber platform. In 2019 Uber released the first of three U.S. Safety Reports. The first release covered the years 2017 – 2018, the second report covered 2019 - 2020, and the third report covered 2021 – 2022.
- J. According to Uber, the reports include information about three categories of what it considers "critical safety incidents: Motor vehicle fatalities, Fatal physical assault and Sexual assault."¹¹ The sexual assault data in these reports only includes what Uber identifies as the five most serious categories of sexual assault but does not include the data of numerous other categories of sexual assault / misconduct.¹²
- K. On the Uber website regarding the safety reports, Uber explains its reason for publishing these reports as follows:
- "Most companies don't talk about these hard issues, and they don't share data about serious safety incidents because doing so can invite negative attention—even though these incidents affect all companies. We believe it's time for a new approach. Keeping this information secret doesn't make anyone safer. These reports bring hard data to bear in order to drive accountability and improve safety for Uber and the entire industry."¹³
- L. Beginning in February 2025 I was contacted by counsel representing several plaintiffs and asked if I would review their complaints and action against Uber, as well as review other documentation as necessary to offer opinions regarding Uber's efforts to address and prevent sexual violence and other associated behaviors / crimes (injuries suffered as a result of rape, sexual assault, sexual battery, sexual harassment, false imprisonment, kidnap, and or physical assault of plaintiffs by

¹¹ See, e.g., 2017-2018 Uber's US Safety Report at p. 14. <https://www.uber.com/us/en/about/reports/us-safety-report/>

¹² *Id.*

¹³ Uber's US Safety Report- Uber Website: <https://www.uber.com/us/en/about/reports/us-safety-report/>

their Uber driver), as outlined in the complaint (Uber Technologies Inc., Passenger Sexual Assault Litigation – MDL #3084).

VI. Opinions:

The basis and reasons for the opinions expressed are based on my review of the materials provided in this matter, and my knowledge, education, training, and public safety and crime prevention experience, including my work as a national advisor and trainer and subject matter expert on sexual assault / misconduct.

A. It is more likely than not that the crimes of sexual assault and sexual misconduct by Uber drivers on Uber Riders were foreseeable to Uber. Information was available to Uber about the risk that Uber drivers would commit sexual assault / misconduct crimes against Uber Riders on the Uber platform.

The basics of the Crime Prevention Problem Analysis Triangle are to eliminate or influence any one of the three essential conditions that are present when a crime occurs: opportunity, ability and desire; or similarly offender, location, target/victim. Although Uber knew that there were three critical lenses to safety, it appears that Uber has failed to recognize that it has control or influence over all three elements: offender (driver), location (Uber vehicle) and target/victim (Tider).¹⁴ The goal is to eliminate, or direct prevention efforts to influence, any one of the three elements. Uber has the opportunity to educate, influence, and monitor all three elements to prevent or reduce the likelihood of an Uber driver committing sexual assault / misconduct on an Uber Rider on the Uber platform.

1. Uber created the opportunity by putting strangers, alone, in an Uber vehicle together, including at night.

From the start of this business concept there is an obvious safety concern for Uber, its drivers, and especially the Riders. This business model essentially involves putting two strangers in a vehicle together (“stranger danger”), in a wide variety of environmental and situational factors that contribute to conditions common to sexual violence and predatory behavior. Generally, some of these factors include:

- Sexual offenders look for and exploit favorable environmental and situational opportunities to gain access to vulnerable populations. Vulnerable populations that are often targeted by offenders include victims that are under the influence of alcohol or drugs, or generally persons that the offender believes are less likely to report the offense, or who are less likely to be believed if they do report the offense;
- Offenders leverage power and control dynamics to suggest, coerce, or force a victim to comply with the offender’s demands. The power and control dynamics that offender’s exploit in rideshare sexual assault / misconduct cases creates a significant vulnerability for the Rider. These dynamics

¹⁴ UBER_JCCP_MDL_000202154

include general control of the vehicle and door locks, direction of travel, ability to drive to isolated locations, threats of not bringing Riders to their desired destination (kidnapping, unlawful restraint), dropping Riders off in unsafe locations. These are all significant power imbalances that an offender can exploit while in control of a vehicle;

- Offenders target victims they believe are vulnerable. The power and control dynamics for the driver creates a significant vulnerability for the Rider. The Rider has to trust that Uber's commitment to safety means they are safe from harm before they get into a vehicle with a "stranger;"
- These crimes occur in isolation on purpose. The offender wants to ensure there are no witnesses. Sexual assaults that occur outside, or in vehicles, are more often committed at night, under the cover of darkness, when there are less witnesses, and when alcohol consumption may be higher;
- When there is no supervision, monitoring, accountability, and no consequences for offenders, this can lead to escalating behaviors, and escalating violence by the offender;
- Research and experience helps us understand that the overwhelming majority of those who choose to sexually offend are men and they more frequently target women who they believe are vulnerable. While men can be victims, and women can be offenders, the historical perspective is clear that men are more often the offender, and women are more often the victim; and
- Understanding and collecting data regarding these offender behaviors, as well as the data on the environmental or circumstantial factors that can increase risk of sexual assault / misconduct is an important strategy in awareness and prevention. Collecting, analyzing, and acting on this data can help increase public awareness, improve prevention efforts, and ultimately increase public safety.

Without sufficient prevention measures in place designed to eliminate or influence opportunity, ability and desire, or similarly offender, location, and target/victim, it is more likely than not that offenders will continue to offend and potentially escalate behaviors and violence.

2. Uber knew about the risk of Uber drivers committing sexual assault / misconduct against Uber Riders in Uber vehicles. Uber has been aware of the prevalence of sexual assault / misconduct occurring on the Uber platform for many years.

Uber has been aware of the prevalence of Uber drivers committing sexual assault and sexual misconduct against Uber Riders for many years. In an Uber document dated 8/8/2014, titled “Uber External Business Rules,” Uber acknowledged that severe driver and Rider misconduct was occurring on the Uber platform. The conduct mentioned in the rules document includes, “Violence, Sexual Assault, Sexual Harassment, Use of a Weapon, or Kidnapping.”¹⁵

- The 2014 rules document guidance offers that when severe incidents are reported, the Uber employee is instructed to report immediately to GM, comms, and legal partners.” The reason stated for the immediate report is not because safety is our priority, rather the reason in this rules document is: “We want to know about severe issues that might hit the press, or prompt a lawsuit, or cause police action as soon as possible,” and “We want to make sure we are in front of Legal/Press issues.”¹⁶
- Another section of the 2014 rules document is titled: “Poor Client Experience Issues,” with the “principle” guidance being: “Do not accept responsibility for driver actions or admit the Rider’s version is what actually occurred.”¹⁷
- The 2014 rules document does indicate that severe matters must be taken seriously by Uber. The rules document then goes on to question if drivers should be deactivated while Uber investigates reports: “do we want to deactivate drivers while we look into major complaints? I suggest we do, but it is a biz call.”¹⁸

Despite these identified severe offenses, Uber has failed to caution Riders/consumers and communicate this awareness, which ignores an important step in public safety and crime prevention efforts: public awareness and engagement. If the public is aware of the totality and prevalence of sexual assault / misconduct, and the high-risk factors on the Uber platform, they will be better informed to make decisions for their own safety.

Of note, while Uber was well-aware as early as 2014 of the prevalence of sexual assault / misconduct , in an email from from Travis Kalanick (Uber former CEO) to “Uber Team” dated 2/12/2016 and titled “Uber OKRs,” Mr. Kalanick described Uber’s priorities for 2016 and stated, “what’s going to matter most to Uber from a high level.” Then CEO Kalanick outlined nine objectives for 2016 in a three-page Email to the Uber Team. The number one objective for 2016 was titled: “Butts in seats.” The objective indicated: “At Uber, everything starts with getting more people in Uber connected cars...”¹⁹

None of the nine objectives CEO Kalanick prioritized included safety, and there is no reference to sexual assault/misconduct awareness and prevention efforts in the three-page document. If safety

¹⁵ UBER_JCCP_MDL_001560764 at 0774.

¹⁶ *Id.*

¹⁷ *Id.* at 0775.

¹⁸ *Id.* at 0776.

¹⁹ UBER-MDL3084-000114641

is truly the priority, and sexual assault/misconduct is an identified problem on the Uber platform, why isn't this communicated in the 2016 Priorities by the Uber CEO?

In another example of Uber's awareness of the prevalence of sexual assault, Sunny Wong's deposition, Exhibit 2804, Wong acknowledges that Uber received 4,084 sexual assault/misconduct reports in the U.S for a four-month period between September 1, 2016 and January 9, 2017.²⁰

The four-month period of the 4,084 reports of sexual assault / misconduct represents 130 calendar days, meaning there were 31.4 sexual assault / misconduct in the U.S per day for that time period. There is no record of Uber efforts to increase awareness for prevention by releasing the four-month data of 4,084 reports of sexual assault / misconduct, or 34.1 sexual assaults / misconduct per day on the Uber platform.

Sunny Wong's deposition testimony regarding Exhibit 2806, Data from July 2016 to July 2017 indicates there were 24,392 reported incidents of sexual assault / sexual misconduct in the U.S., on the Uber platform. Wong acknowledges that he is not aware if Uber shared this data with the public.²¹

The one-year period of 24,392 reports of sexual assault / misconduct represents 365 calendar days, meaning there were 66.8 sexual assault / misconduct incidents reported on the Uber platform per day. There is no record of Uber efforts to increase awareness for prevention by releasing the one-year data of 24,392 reports of sexual assault/misconduct, or 66.8 sexual assaults/misconduct per day, on the Uber platform.

Starting in 2019 Uber released the first of three U.S. Safety Reports. The first release covered the years 2017 – 2018, the second report covered 2019 – 2020, and the third report covered 2021 – 2022. The Safety reports provide information on the five most serious sexual assault categories according to Uber. Uber tracked these five categories totaling 12,522 sexual assaults over the six-year period, averaging 2087 per year, and an average of 5.7 per day.

Currently, Uber's website message regarding its release of its safety reports and data states: "Keeping this information secret doesn't keep anyone safer."²² I couldn't agree more as awareness of the totality and prevalence of the problem is critical for prevention. While this is Uber's first acknowledgement and effort to create awareness, Uber Safety Reports only released the data of what Uber defined as the five most serious categories of sexual assault. Uber did not include an analysis of the thousands of additional reports in the other sixteen categories of sexual assault / misconduct that were reported on the Uber platform in the U.S during the same period.

Based on Uber's internal data disclosed for the first time in this litigation, Uber has released data for all twenty-one sexual assault / misconduct categories. Unlike Uber's safety reports that only included what Uber classified as the five most serious sexual assault reports, this new data includes the other sixteen categories of sexual assault / misconduct; (all twenty-one categories):

²⁰ Sunny Wong 4/16/25 Deposition 56:21-57:24; Exhibit 2804 at page 7. (UBER_JCCP_MDL_000031720)

²¹ *Id.* at 92:16-93:25.

²² <https://www.uber.com/us/en/about/reports/us-safety-report/>

- Uber received 546,196 reports of sexual assault / misconduct incidents in the United States across all twenty-one categories occurring on the Uber platform for the time period 2017 – 2024.²³
- Breaking down the number of incidents by year, Uber received 71,080 reports in 2017, 93,464 in 2018, 99,201 reports in 2019, 41,360 reports in 2020, 34,790 reports in 2021, 52,933 reports in 2022, 70,530 reports in 2023 and 82,838 reports in 2024.

This yearly data indicates that the daily number of sexual assault / misconduct incidents reported on the Uber platform every day from 2017 – 2024 in the U.S. averages 186.93 incidents a day, and the frequency of these reports indicates that there are an average of 7.789 reports of sexual assault / misconduct on the Uber platform in the U.S. every hour.

The twenty-one categories cover a broad range of sexual assault / misconduct offenses, and the numbers are significantly higher than what Uber publicly released in their Safety Reports.

Uber is clearly aware of the prevalence of sexual assault and sexual misconduct on the Uber platform and the risk to Riders, but the Director, head of safety for the Americas, U.S., Latin America, and Canada, disputes the everyday occurrence of sexual assault on the Uber platform. In the Deposition of Director Hannah Nilles, she is asked if she understands that every day, women are sexually assaulted on Uber and her response is: “I don’t necessarily think that’s true.” Nilles adds that she “can’t recall the exact number off the top of my head.”²⁴ Director Nilles also testified: “I would consider any report of sexual assault to be exceedingly statistically rare.”²⁵

Given Director Nilles position as head of safety for the Americas, this is a very concerning disconnect from a public safety and prevention perspective.

Director Nilles acknowledges: “Uber knows that an important part of reducing sexual assault at large is to focus on awareness, education, for all the people that are involved from the beginning to the end, including employees, drivers, and Riders.”²⁶ Regardless, Uber has not released this important information.

Senior Vice President of Safety and Core Services, Henry Fuldner, seems to agree with Nilles position on the importance of Rider/consumer awareness: (Uber) “explain each of our safety features and promote awareness of the safety features in our app, which is, I think positive for making the platform safer and helping people learn about it.”²⁷ Despite the acknowledgement by two senior Uber officials of the importance of Rider/consumer awareness for prevention, and safety, Uber has not made Rider/consumers aware of the totality and prevalence of sexual assault / misconduct occurring every day in the U.S. on the Uber Platform. I note that Uber has not disclosed the number of sexual assault / misconduct incidents from 2009 – 2016.

²³ *In re Uber Technologies, Inc., Passenger Sexual Assault Litigation*, (Case No.: 3:23-MD-03084 CRB) Incident Report Classification of Dominant Tickets for 2017-2024.

²⁴ Hannah Nilles 5/29/25 Depo 574 :18-575 :10

²⁵ Hannah Niles 6/30/25 MDL 30(b)(6) Depo (pg33-34)

²⁶ *Id.* 34:9-11

²⁷ Henry (Gus) Fuldner 3/27/2025 MDL Depo 569:13-18

By not releasing the data from the other sixteen categories of sexual assault / misconduct, Uber is engaging in a long pattern of denying Riders/consumers awareness of the totality and prevalence of sexual assault / misconduct on the Uber platform. This denies critical information for Riders/consumers to make informed prevention and safety strategies, putting consumers at greater risk for sexual assault / misconduct on the Uber platform.

It should also be noted that the sexual assault / misconduct offense categories that are not released cover a wide range of behaviors and conduct that sexual offenders use as part of targeting, testing, grooming behaviors, and manipulation of potential victims. Riders/consumers should be aware of the prevalence of these behaviors and conduct on the Uber platform as potential early warning signs of possible sexual assault. As Uber has communicated in their safety reports: “keeping this information secret doesn’t keep anyone safer.”

3. Uber also knew about the high-risk factors for sexual assault / misconduct.

By at least February 2017, Uber had identified that sexual assaults on the Uber platform “have patterns and precursors.”²⁸ For example, Exhibit 2803 acknowledges the following:

- “Bars + late night + weekends the majority of sexual assault incidents happen late at night, male offenders and female victims, offenders have previous safety incidents, lower ratings, and higher Bouncer Risk Score, results demonstrate viability of quick rules to block risky matches for example the following rules can produce / predict 3.6% sexual assault incidents with less than .5% of trips being impacted.”
- “Trips take place on Saturday/Sunday trip time between 12am – 4am, driver-Rider different gender, number of bars within 50 meters of request, point greater than / equal national average, Bouncer score is above .9, baseline model that they are working on can predict 8.2% of sexual assault incidents with less than .5% of trips being impacted.”²⁹

Further, Uber acknowledges the following risk factors in Exhibit 2804, which is a PowerPoint dated February 2017, titled “Preventing Sexual Assaults, Trust and Safety Data Science”:

- Uber studied sexual assault data and determined that predictors include: “weekend nights early morning hours, near bar pickup, male offender, female victim, drivers who offend have lower ratings,” including ratings from female Riders.³⁰
- Despite “bar pickup” (alcohol / intoxication) risk factor. Uber has historically emphasized safe rides for persons who have been consuming

²⁸ Sunny Wong 4/16/25 Deposition (51: 14-16), Exhibit 2804 (UBER_JCCP_MDL_000031720).

²⁹ *Id.* at 49: 15 – 53: 12

³⁰ *Id.* at 53: 15 – 74: 14

alcohol as an important strategy for their business success, while not fully addressing sexual assault prevention.

Uber acknowledges the following risk factors in Exhibit 2806 dated 7/12/2017, titled “Sexual Assaults, Trends + Correlates, Uber Safety and Insurance Team”:

- “To Support ongoing efforts to prevent sexual misconduct on the Uber platform, this document describes high-level trends + correlates related to the timing, location, and perpetrators of sexual assaults in the U.S.” “The new results are consistent with previous findings. Sexual assaults are more common late night, on weekends, in spring months, and near bars. They are also more likely to be caused by males, those with a previous history of safety incidents, and those with higher 1-star rates.”³¹
- Data from Uber shows that for trips that ended in sexual assault are 2.27 times more likely to have a driver and Rider of different genders. “Sexual assaults caused by drivers are 12x more likely to be caused by a driver with greater than 0 previous sexual misconduct complaints against them.”³²
- Feedback from Riders: “Comments about drivers from Riders contain signals for predicting sexual assaults. Trips ending in driver-caused sexual assaults are nearly 15x more likely to have a driver who previously received Rider feedback containing the word 'kiss,” “5x more likely to have a driver who previously received Rider feedback containing the word, ‘sex,’ and 4x more likely to have a driver who previously received Rider feedback containing the phrase, “inappropriate behavior.”³³

³¹ Exhibit 2806 at 7315 (UBER_JCCP_MDL_001687315); Sunny Wong 4/16/25 Deposition (91: 18 – 25)

³² Sunny Wong 4/16/25 Deposition (104: 13 – 21)

³³ *Id.* at 105: 19 – 106: 7

In fact, Uber even studied driver behaviorisms in an Uber chart titled “Odds ratio for ‘Creepy’ Driver Feedback,” which is set forth below:

Table 9: Odds Ratio for “Creepy” Driver Feedback

	Cases	Controls		
	Percent Exposed	Percent Exposed	Odds Ratio	95% CI
Kiss	0.17%	0.01%	14.836	5.473 - 40.219
Sex	0.67%	0.15%	4.526	2.761 - 7.419
Inappropriate Behavior	1.18%	0.33%	3.614	2.486 - 5.254
Flirt	0.5%	0.14%	3.561	2.015 - 6.294
Creepy	2.1%	0.96%	2.207	1.667 - 2.923
Rude	4.16%	2.96%	1.424	1.164 - 1.742

See [Appendix A](#) for details on computing and interpreting odds ratios.

- "Sexual assaults caused by drivers are nearly 3x more likely to be caused by a driver with a 1-star rate greater than the mean, and sexual assaults caused by Riders are 1.5x more likely to be caused by a Rider with a 1-star rate greater than the mean."³⁴

In another example, Uber acknowledges the following risk factors in Exhibit 2807 dated 6/25/18 titled “Personal Safety Deep Dive: Sexual assault Focused”:

- “Majority of sexual assault offenders on the Uber platform are male.”
- “Sexual assaults are generally concentrated to late-night, weekend hours.”
- “Nearly **half** (emphasis original) of sexual assaults in the US originated within 50m of a bar.”
- “Over half of audited Sexual Assault reports include an intoxicated Rider.”
- “A third of Sexual Assault reports are indicated to have a Rider who is alone in the vehicle.”

³⁴ *Id.* at 108: 1-6

- “In over 15% of audited Sexual Assault reports, the Rider was indicated to be sitting in the front.”³⁵

I want to acknowledge that Uber has identified helpful high-risk factors, feedback tags and “creepy driver” behaviors that Uber identified are predictors of sexual assault / misconduct on the Uber platform. All of this information is consistent with my knowledge, education and experience regarding sexual offender behaviors including the behaviors that are recognized as potential testing and grooming.

My findings are that, despite the value of the critical information that Uber knew, Uber still has not shared this information publicly with Riders/consumers to increase awareness for enhanced safety and prevention or specifically tell Riders of these factors that can result in potentially high-risk rides. In addition to the risk factors that Uber has identified above, Uber also identified that certain feedback tags, “professionalism”, “comfort” and “conversation” were more likely to result in sexual assault / misconduct.³⁶ Further, Uber identified that the more Professionalism, Comfort/Conversation/Other tags per trip rate a driver has, the more likely the driver will receive another sexual assault / misconduct ticket in the following 10-30 trips.³⁷ Uber found that a driver has a 3x-5x higher risk to commit sexual assault/ misconduct in the next 30 trips after a trip with professionalism/comfort/conversation tag than after a 1-4 star trip without those tags.³⁸

Uber has actual notice of this critical information, which is predictive of sexual assault / misconduct. Despite being on notice, Mr. Brown testified that “it wouldn’t be Uber’s process to follow up with the Rider in relation to these feedback tags” unless the Rider reached out by another channel in their report to Uber about a safety incident. He testified there is no “supplemental follow-up just on the basis of the rating and feedback tag.”³⁹ Without investigating, monitoring, or reviewing the high-risk factors that Uber knew including the feedback tags, it is ignoring opportunity to prevent and/or reduce likelihood of sexual assault / misconduct.

B. It’s more likely than not that Uber could have prevented or substantially reduced sexual assault / misconduct by Uber drivers on Uber Riders on the Uber platform.

There is also evidence that they did not fully act on the high-risk data in an effort to implement risk reduction strategies for prevention of sexual assault / misconduct on the Uber platform, more likely than not putting Uber Riders/consumers at greater risk.

Uber can reduce the known risk of sexual assault / misconduct committed by Uber drivers against Uber Riders on the Uber platform by fully implementing effective Response strategies, information, and tools including video and/or audio recordings, women to women pairing, failure to adequately educate the Uber driver on sexual assault and consent, failure to investigate and/or

³⁵ UBER_JCCP_MDL_001755017

³⁶ UBER_JCCP_MDL_000454790 at 5121

³⁷ *Id.*

³⁸ UBER_JCCP_MDL_003273474 at 3495

³⁹ Gregory Brown Deposition 8/26/25 (279: 8-14)

act on certain warning signs and high-risk factors of sexual assault / misconduct, Uber had available, or was aware of. It is more likely than not that this position has put Uber Riders/consumers at greater risk of experiencing sexual assault / misconduct on the Uber platform.

The basics of the Crime Prevention / Problem Analysis Triangle recognizes that crimes occur when three elements exist: Ability, Desire, and Opportunity, or similarly Location, Offender, and Target/Victim. Crime prevention efforts are enhanced with community engagement in the development of multidimensional and informed problem-solving strategies directed at removing, or reducing, any one of the three elements:

- **Ability:** Eliminate misleading assurances of comprehensive / rigorous background and screening process, address identified deficiencies, and improve background and screening process to further eliminate bad actors.
- **Desire:** mandate driver education as a deterrent: promote professional driving with a zero-tolerance message about sexual assault / misconduct (no sexual acts). This should include greater accountability and monitoring of the identified risk factors, emphasis on Rider vulnerabilities including intoxication, deactivation efforts and results, eliminate barriers to victim reporting, and promote clear messages to drivers that Uber will encourage and fully support law enforcement investigations of criminal behavior. Uber prevention and safety features will be more effective with mandated education that emphasizes accountability (eliminate desire).
- **Opportunity:** Improve Rider/consumer awareness of the totality and prevalence of sexual assault / misconduct, and the identified risk factors, on the Uber platform. Implement women matching to address rates of sexual assault / misconduct by male drivers on female Riders. Improve driver accountability by monitoring driver behaviors through mandatory camera / recording policies, or consider conditional use of camera / recording devices during trips when identified risk factors exist. Investigate driver low ratings – especially from female Riders, confront drivers for low ratings and complaints to enhance monitoring and accountability. Collect and analyze data to understand the full extent of the problem – develop increased driver accountability for potential deactivation. Monitor and Assess the results of prevention efforts to enhance safety and prevention of sexual assault / misconduct on the Uber platform.

Prevention can be further enhanced through collaborative problem-solving tools such as SARA to ensure that all steps are taken to prevent crimes:

S = Scanning: Understanding the totality and prevalence of the problem of sexual assault / misconduct.

A = Analysis: Examining the root causes and potential risk factors and applying the crime prevention and problem analysis triangle theories.

R = Response: Developing and implementing multidimensional initiatives to address and reduce risk factors and/or prevent and eliminate the totality and prevalence of

the problem, including incorporation of community engagement in awareness and prevention Responses.

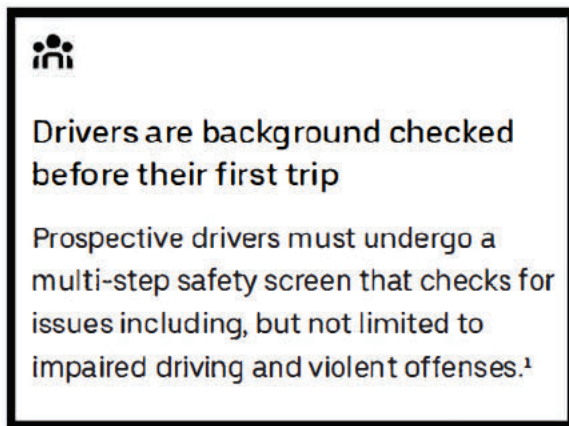
A = Assessment: Collecting data and performing analysis to determine the effectiveness of Responses in reducing and/or eliminating the totality and prevalence of the problem to enhance public safety. Look for and correct any unintended consequences from all of the Responses.

While Uber has conducted an Analysis that has assisted in developing tools for Response, these tools have not been effectively or completely implemented.

Several tools exist, and if effectively implemented into a multidimensional Response strategy, are likely to prevent and/or reduce the likelihood of sexual assault / misconduct. Those tools include the following:

- 1. Screen out bad actors:**
 - i. Address deficiencies in the screening process**
 - ii. Improve background and screening processes to avoid false reassurance.**
 - iii. Be honest about the limits of screening to avoid false reassurance.**

Lack of Thorough Background Investigation Prevention begins with awareness, and Uber's identification of high-risk factors for sexual assault / misconduct makes it clear that risk reduction and prevention strategies should be implemented in the hiring / onboarding of drivers. As indicated on the Uber website in the below screen shot, Uber drivers are background checked before their first trip.



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⁴⁰ Driver Screenings - Uber Website - <https://www.uber.com/us/en/ride/safety/driver-screening/> (7/9/2025)

Director of Safety for the Americas, Hannah Nilles, testified that Uber does not generally conduct interviews for driver onboarding and that the driver background checks do not include phone calls, Zoom calls, no request for a professional resume, and no previous checks of job performance or references before becoming an Uber driver. Nilles stated that the reasons Uber background checks do not include these steps: “Number 1, it would be operationally very complex; 2, I don't think that it would necessarily provide any additional safety benefits, and I think that the processes that we do have, do a very thorough job at vetting potential and prospective drivers.”⁴¹

While Director Nilles believes Uber’s current background process does “a very thorough job,” the totality and prevalence of sexual assault / misconduct on the Uber platform, and the identified sexual assault / misconduct high-risk factors suggest otherwise.

Director Nilles agreed that Uber generally does not review employment files or records from drivers during screening, no educational background, no educational disciplinary records for sexual assaults, or lawsuits stating: “if it’s not a criminal charge” then I suppose “I think it would not be considered.” Director Nilles acknowledged that military records are not considered, no driver interview, no references requested, no search of social media prior to somebody applying, no questions of drivers about where they lived abroad, and Uber doesn’t require drivers to disclose past criminal history as Director Nilles indicated: “it’s not really necessary.” There is also no personal history questionnaire.⁴²

Of great concern, is that Uber driver background screening for newcomer populations to the U.S., does not include criminal record checks from the driver’s country of birth, or the countries the driver has resided in (address history).⁴³ Uber characterizes background screenings with limited information as “thin files.” According to Uber witness Jenny Luu, a “thin-file” is a potential Uber driver who does not have long history detected when Uber runs the background check.⁴⁴ In this instance, Uber recognized that people, including Riders, can get hurt.⁴⁵

Director Nilles testimony included a review of Exhibit 452, regarding the Uber “Safety Campaign – We hear you,” beginning 2/17/2020. This marketing campaign was created in an attempt to reassure Riders about driver screening. “When you ride with Uber, every driver is put through a rigorous background check and ongoing screening to review their driving and criminal history.”⁴⁶

When safety is a priority an effective background and screening process should at least include an actual background investigation into the applicant’s personal and work history, place of birth, address history (including outside the U.S. / criminal history), employment history, references, previous employment checks, applicant interview, fingerprint supported criminal record checks that verifies identification of the applicant, and identifies other employment requiring

⁴¹ Hannah Nilles 5/29/25 Depo (572: 2 – 573: 23)

⁴² Hannah Nilles 6/30/25 MDL 30(b)(6) Depo (117-133)

⁴³ Hanna Nilles 7/10/2025 MDL Depo (139-140)

⁴⁴ Jenny Luu 2/27/25 MDL Depo at 170

⁴⁵ *Id.* at 175-6.

⁴⁶ Hannah Nilles 6/30/25 Depo (232, 237-239)

fingerprinting. All of these steps should ultimately be done to reduce driver opportunity to commit sexual assault / misconduct by eliminating bad actors/offenders in the background screening process.

During Director Nilles' deposition, there was a review of the Uber employee handbook for full-time employees, which indicates: "Checking a person's employment history, educational background, and other relevant information is one way we help keep a safe working environment." While the Uber employee handbook recognizes the importance of a safe work environment, it is not the same for Uber driver onboarding background / screening process. Director Nilles indicated that Uber employee background and onboarding Uber driver backgrounds are two separate processes suggesting it is "not legally allowed to use I9 process" for onboarding Uber drivers.⁴⁷

In my review of driver onboarding materials, I reviewed an Email message dated 10/15/2015 discussing the lack of Uber support for federal law enforcement records / fingerprinting including the following Uber employee statement: "Imperative that we will not support federal law enforcement records, fingerprinting etc."⁴⁸

In email messages dated 2/28/2018, regarding background checks and associated costs for fingerprinting, the following Uber employee statement included: "My view is it is indefensible not to do both 1 and 2 and the reputation costs associated with not doing it far exceeds the dollar amount. Happy to discuss." In the same email message: "Background Check Costs: Ops has indicated to Safety team that they are not yet on board with background check changes that have costs associated with them."⁴⁹

In a separate document dated 1/27/2020, there is acknowledgement that Uber is attempting to offset the safety concerns for not fingerprinting drivers, recognizing the value of fingerprinting, particularly regarding verification of driver identity: "We did a gap analysis in terms of what safety measures we could implement to offset the fact that we are not doing fingerprint BGC."⁵⁰

The lack of support for fingerprint supported background checks dates back to at least 2015. Given Uber's stated commitment to safety, and the prevalence of sexual assault / misconduct, and the identified sexual assault high-risk factors associated with the Uber platform, thorough background investigations and name searches should be cross referenced with fingerprint supported criminal record checks to look for and investigate differences between name search results. Because safety is priority, concerns for cost should be secondary.

Director Nilles testimony regarding exhibit 1306, titled "Policy and Comms Safety Needs 2017," identified problems with Uber's driver background and screening process. The exhibit indicates that the error rate for background checks in the United States, 1 in 500. The exhibit also indicates: "we increasingly encounter situations where drivers slip through committed crimes in counties

⁴⁷ Hannah Nilles 6/30/25 MDL 30(b)(6) Depo (134 - 135)

⁴⁸ UBER_JCCP_MDL_002709280 at 9280

⁴⁹ UBER000065684

⁵⁰UBER_JCCP_MDL_000872253 at 2255

outside their county of residence, this may explain the rise of press stories like this,” press story “featuring drivers who should never have gained access to the app.” News stories in exhibits 1307, 1308, 1309, are reviewed all of which cover felony crimes committed by Uber drivers who presumably passed background investigations.⁵¹

Director Nilles further testimony during review of several Uber related exhibits identified additional concerns with Uber driver background / screening:⁵²

- Exhibit 424, titled “Safety and Insurance Strategy,” dated 11/2017, identifies: [REDACTED]
[REDACTED]
[REDACTED]⁵³
- Exhibit 1313 Email dated 1/22/2018, “Uber Alerts” referencing WA Post article “Uber driver in U.S. illegally charged with four California Rapes.” “A Mexican man living in the U.S. illegally used his job as an Uber driver to target intoxicated young women and was charged Monday with raping, assaulting and robbing four victims.” Email indicates: “Checkr flagged this driver’s SSN for us. It is unclear why or what we did with that information, safety legal team is looking into it.”⁵⁴
- Exhibit 1314, 1/19/2018, “Stand for Safety” “Driver [REDACTED]
[REDACTED] (pg208). “We [REDACTED]
[REDACTED]”⁵⁵

From my perspective, Uber is mispresenting the effectiveness of its driver background and screening process. This is not a “rigorous” or “multi-step safety screen,” or an effective background investigation as I know it. Uber is essentially running a limited name search not supported by fingerprinting, that does not include comprehensive criminal record checks. By Uber’s own evaluation, it is error-prone and therefore ineffective. While Uber could and should conduct more rigorous screening to eliminate bad actors from Uber’s driver pool, the fact that Uber chooses not to do more makes it more necessary to employ multidimensional responses already available to it (as discussed throughout) to protect Riders.

2. Adequately educate drivers on sexual assault / misconduct prevention including a zero-tolerance policy and ensure compliance with continued education.

⁵¹ Hannah Nilles 6/30/2025 Depo (164-174), Exhibits 1306 (UBER_JCCP_MDL_001717854), 1307, 1308, 1309.

⁵² *Id.* at 193 – 209

⁵³ *Id.* at 193-196

⁵⁴ *Id.* at 200-214; Exhibit 1313 (UBER_JCCP_MDL_000447888)

⁵⁵ *Id.* at 204-209; Exhibit 1314 (UBER_JCCP_MDL_000416750)

Applying common crime prevention and problem-solving strategies, and given the totality and prevalence of sexual assault / misconduct committed by Uber drivers on the Uber platform, driver education about sexual harassment and sexual assault prevention should be a mandatory and ongoing condition to drive for Uber. Continuing education should also include testing, Assessing and measuring of driver understanding and compliance.

In the rideshare environment, driver education will be more effective when it is mandatory and when it is designed to reduce driver desire and opportunity to commit sexual assault / misconduct.

While Uber may offer some information on sexual assault / misconduct prevention, including a zero tolerance for sexual acts, this information is inadequate from an educational perspective regarding the complex nature of sexual assault / misconduct.

While I understand that Uber partnered with RAINN to develop an educational video, which includes sexual assault / misconduct prevention, it is unclear if drivers actually understood it, let alone reviewed it. There is no record that Uber tested, Assessed or measured compliance with any of this information. Further, there is no evidence of Uber developing and/or requiring any continuing education on the complex issues of Sexual Assault and Sexual Misconduct.

Sexual assault / misconduct prevention education should be on-going and include the dynamics of sexual assault / misconduct, explaining the elements of criminal sexual assault including, issues regarding consent, intoxication, drug / alcohol facilitated sexual assault, the applicable sexual assault laws and penalties, and Uber specific case reviews / examples of Uber driver misconduct and the high-risk factors known to Uber. The education should also include examples of expected professional driving standards.

Uber has developed several “safety” features, but these features will be more effective in preventing sexual assault / misconduct, if there is mandatory and ongoing driver education about monitoring driver conduct. Such continuing education and messaging should address the driver monitoring and safety features that Uber will use to hold drivers accountable to professional driving standards.

While Director Nilles appears to agree with the importance of preventative education, she acknowledged that, “Uber knows that an important part of reducing sexual assault at large is to focus on awareness, education, for all the people that are involved from the beginning to the end, including employees, drivers, and Riders.”⁵⁶ She further testified that “[p]roviding a safe ride home to somebody who is intoxicated is definitely one of our primary use cases.”⁵⁷ What Uber has not communicated about this “primary use cause,” is that women Riders under the influence of alcohol are at a high-risk of sexual assault when the Uber driver is a male.

⁵⁶ Hannah Nilles 6/30/25 MDL 30(b)(6) Depo at 84-88

⁵⁷ *Id.* at 113-114

For example, Uber witness Greg Brown testified that, in the instances of intoxicated Riders, Uber failed to provide education on several material points, including the reasons for a no-sex rule to drivers and that the drivers would be in a position of trust, entrusted to transport people who might be too surprised or scared to show resistance, fight or escape if the driver took advantage of them.⁵⁸ Further, Uber knew that the drivers would probably be transporting intoxicated Riders, people who could possibly be unable to care for themselves; too intoxicated to scream, fight or run; too afraid or too surprised to voice their lack of consent, or scream or fight or escape.⁵⁹

Finally, Uber never tested drivers to determine whether drivers who received any training at any level actually heard, read, listened to or understood the training on the concept of intoxicated Riders that may not be able to voice their non-consent.⁶⁰

For all of these reasons, it is more likely than not that Uber's lack of adequate driver education has put Riders/consumers at greater risk for sexual assault / misconduct.

3. Monitor and act on Rider feedback, including complaints, GPS anomalies and lower ratings, to hold drivers accountable.

Uber knew that certain feedback it received from a Rider about a driver after a trip was correlated to an increased risk of sexual assault / misconduct in subsequent trips. Uber studied this issue and determined that “[t]he ‘professionalism,’ ‘comfort’ and ‘conversation’ tags are more likely to result in sexual assault / misconduct ticket than others. The more Professionalism/Comfort/Other tags per trip rate has, the more likely the driver will receive another sexual assault / misconduct ticket in the following 10-30 trips.”⁶¹ Yet, despite this knowledge, Gregory Brown who leads central safety operations at Uber, testified that it is not “Uber’s process to follow up with the Rider in relation to these feedback tags, unless there had been a supplemental help contact in addition to the feedback tag and rating.”⁶²

Further, Uber does not follow up on any RideCheck notification, even if there is no response from the Rider, unless the Rider makes a separate report of a safety incident.⁶³ This means that even if there had been a RideCheck anomaly during a ride, i.e. a long stop or a mid-way drop-off, and the Rider later gives a low star rating, or selects certain feedback tags (which Uber knows is correlated to an increased risk of sexual assault / misconduct on subsequent trips), Uber does not follow up with those Riders to see what may have happened.⁶⁴

Applying common crime prevention and problem-solving strategies, and given the totality and prevalence of sexual assault / misconduct on the Uber platform, Uber can reduce driver desire and opportunity to commit sexual assault / misconduct by monitoring for accountability. For example,

⁵⁸ Greg Brown Depo 7/15/25 MDL 30(b)(6) at 23-37.

⁵⁹ *Id.*

⁶⁰ *Id.* at 27-28.

⁶¹ UBER_JCCP_MDL_000454790; *see also* UBER_JCCP_MDL_005585232; UBER_JCCP_MDL_003273474; UBER-MDL3084-000000680-UBER-MDL3084-000000681

⁶² Greg Brown Depo 8/26/25, 279:2-281:4, 290:24-291:8; 292:10-15; 272:6-273:2; 277:10-18.

⁶³ *Id.* at 420:11-17.

⁶⁴ *Id.* at 287:19-288:16.

Uber can more effectively monitor ratings and/or Rider feedback including feedback tags, complaints, and/or GPS anomalies. While Uber has conducted an Analysis to identify these high-risk factors, the Response is insufficient. Uber fails to monitor, investigate or follow-up on any high-risk factors when one or more occur on a single Uber ride.

4. Implement gender matching options that work.

Uber has identified several sexual assault high-risk factors, including that the majority of sexual assaults / misconduct are committed by men. Uber has also identified a solution to reduce the likelihood of sexual assault / misconduct on the Uber platform specific to this high-risk factor: Women Matching. Uber has identified positive results in other countries and pilot test sites for prevention and reduction in sexual assault / misconduct cases, and Uber drivers and Riders have expressed interest in this safety feature.

In an Uber document titled “Women’s Safety Engagement Plan,” dated 8/28/2016, Uber acknowledges that the “perception that Uber is unsafe for women has been a significant issue for police and PR.” Uber also acknowledges that the emergence of other women only rideshare services has caused Uber to be asked if they will do the same. The document goes on to discuss tactics to “turn this narrative around,” in order to “help us pushback on opponents who say that fingerprinting and/or women only services help make women safer.” Since 2016, according to this Women's Safety Engagement Plan, Uber's strategy regarding a women-matching option was to push back on opponents who said that women-only services make women safer – instead of working to develop women-only services.⁶⁵

In an Uber PowerPoint presentation titled, “Women Driving Women, Uber Product Exploration,” dated 12/14/2017, includes a problem statement and solution statement.⁶⁶

- The problem statement acknowledges: “that Rider and driver safety is a top concern amplified by public perception and need for action, Uber needs to develop innovative ways to increase customer trust and decrease rate of failure, without sacrificing quality, reliability, or affordability.”⁶⁷
- The Solution statement acknowledges: “Using a whitelisted product view that directly matches women drivers with women Riders, Uber should be able to increase both Rider trust, perception, and safety, while lowering rate of incident.”⁶⁸

Despite recognizing women matching women options as early as 2016, and developing the problem statement and identified solution in 2017, Uber still has not fully implemented a women matching women option to help reduce the likelihood of sexual assault / misconduct on the Uber

⁶⁵ Rebecca Payne Depo 4/2/25 at 258-263, Exhibit 2529 (UBER_JCCP_MDL_000959841)

⁶⁶ *Id.* at 263-266, Exhibit 2530 (UBER_JCCP_MDL_001546044)

⁶⁷ *Id.*

⁶⁸ *Id.*

platform in the U.S. By not fully implementing Women Matching options in the U.S., Uber has put Riders at greater risk of sexual assault / misconduct.

As recently as Rebecca Payne’s deposition on 4/2/2025, she acknowledges the safety benefits of the women matching women option, and shared that numerous recommendations and efforts through the years to launch a women matching women option in the U.S at Uber have been considered. Despite the safety and prevention benefits, Payne acknowledged that Uber still has not fully implemented a women matching women option, and most recently, and in part, as a result of the current U.S. political climate.⁶⁹

On July 23, 2025, Uber announced: “For the first time in the US, we’re launching Women Preferences—features designed to give women Riders and drivers more choice, more confidence, and more flexibility when they use Uber. Pilots will begin in Los Angeles, San Francisco, and Detroit in the next few weeks.”⁷⁰ Uber has limited the offering of this feature to only a few select cities.

5. Avoid risky matches between drivers and Riders.

- i. Use Uber data and high-risk factors known to Uber to avoid potentially risky pairings.**
- ii. Make Riders aware of high-risk factors and potentially risky pairings.**

Uber has identified high-risk factors for Sexual Assault/Sexual Misconduct. Based on this information, it developed its S-RAD (Safety Risk Assessed Dispatch) model, which uses “a variety of trip, driver and Rider-level predictors to detect driver-Rider matches with elevated risk of sexual assaults.”⁷¹ When Uber is choosing which driver to dispatch in response to a Rider’s trip request, S-RAD is the one and only way it uses its data and knowledge about the risk of sexual assault / misconduct to try to avoid high-risk pairings.⁷²

However, Uber does not always follow up or intervene to enhance prevention and/or reduce the likelihood of sexual assault / misconduct. At times, despite knowing that there is an elevated risk of sexual assault / misconduct if it pairs a particular driver with a particular Rider’s trip request, Uber still dispatches the ride.

By March 2016, Uber was working on identifying patterns related to sexual assault and sexual misconduct in light of the fact Uber believed “safety incidents follow patterns and have precursors that can be leveraged to forecast them before they happen.”⁷³ Uber’s Trust and Safety Data Science team acknowledged in February 2017 that “sexual assaults have patterns

⁶⁹ Rebecca Payne Depo. 5/15/25 Vol IV at 909 – 1005.

⁷⁰ [Coming Soon: Women Preferences | Uber Newsroom](https://www.uber.com/newsroom/women-preferences/) - <https://www.uber.com/newsroom/women-preferences/>

⁷¹ UBER_JCCP_MDL_003306684 at 3306697.

⁷² Sunny Wong Depo. 6/25/25 at 232:18-233:9 (“Other than S-RAD, is there any other safety-related intervention that Uber does in its dispatch decision-making? A. Not specific to dispatch.... Q. Right. But with respect to choosing which driver to pair with a ride and to dispatch, the safety-related interventions Uber are S-RAD, right? A. Correct.”)

⁷³ Hannah Nilles Depo. 8/7/2025 at 434:5-438:8; Ex. 1884 (UBER_JCCP_MDL_003231342).

and precursors.”⁷⁴ The team found that offenders have previous safety incidents, lower ratings, and higher Bouncer risk scores.”⁷⁵

In response to the knowledge that sexual assault has risk signals, Uber developed S-RAD (Safety Risk Assessed Dispatch) a “safety matching tool” that “seeks to prevent sexual assault.”⁷⁶ S-RAD leverages predictors to detect driver-Rider pairings with elevated risk of sexual assault.⁷⁷ S-RAD tries to “identify Rider-driver pairings as part of the matching platform, and then tries to reduce the probability of those plans from potentially getting dispatched.”⁷⁸ With S-RAD, Uber “scores potential [Rider-driver] pairings based on the risk of sexual assault or sexual misconduct for each pairing.”⁷⁹ Mr. Wong has testified that S-RAD is potentially the “most effective intervention for preventing sexual assaults.”⁸⁰

From a problem solving perspective, Uber has conducted a good Analysis of the problem, designed S-RAD as the potential Response but, as acknowledged, Uber still sometimes dispatches a driver to respond to a ride request even when it knows high-risk factors may be present. Mr. Wong testified that even when S-RAD flags trips as risky, Uber still sometimes dispatches them.⁸¹ Uber notes in a document created in 2021 but modified as recently as July 12, 2024 titled “Leadership Update” its “Policy view: Concern is that if in the future, we have to disclose information on this, how we explain or justify we had the information that it was a high-risk trip but we still match it and we even send a nudge to those involved, and a very bad incident happened. From my perspective, it will be [hard] to explain that to the public, gov officials, etc.”⁸²

Unfortunately, what this information exposes is that Uber is not using its technology to block these pairings, even though Uber’s own data confirms the increased risk of sexual assault / misconduct and Uber knows about high-risk factors. Meanwhile, Uber Riders are not made aware of the increased risks of sexual assault/ misconduct.⁸³

6. Require cameras and/or recording in Uber vehicles

Applying common crime prevention and problem-solving strategies, and given the totality and prevalence of sexual assault / misconduct on the Uber platform, the location of the crime is a key

⁷⁴ *Id.* at 444:21-446:25, Ex. 1885 (UBER_JCCP_MDL_000031720).

⁷⁵ *Id.* at 447:1-25, Ex. 1885 (UBER_JCCP_MDL_000031720).

⁷⁶ UBER_JCCP_MDL_001144266; UBER_JCCP_MDL_001101922; UBER_JCCP_MDL_003306684; UBER_JCCP_MDL_001730324; UBER_JCCP_MDL_003224079.

⁷⁷ Wong Dep. 6/25/25 at 37:11-57:24, Exs. 1239 (UBER_JCCP_MDL_002266899), 1240 (UBER_JCCP_MDL_3306684).

⁷⁸ *Id.* at 34.

⁷⁹ *Id.* at 149:7-11.

⁸⁰ *Id.* at 35-37, Wong Ex. 1239 (UBER_JCCP_MDL_002266899).

⁸¹ *Id.* at 127-128.

⁸² *Id.* at 128-129, Akamine Ex. 889 (UBER_JCCP_MDL_003274193 at 4711).

⁸³ *Id.* at 160:11-186:10, 191:14-220:25, Exs. 1239 (UBER_JCCP_MDL_002266899), 1240 (UBER_JCCP_MDL_3306684), 1247 (UBER_JCCP_MDL_001755017), 1248 (UBER000204698), 1249 (UBER_JCCP_MDL_001687315).

element to address for crime prevention. The location of sexual assault / misconduct rideshare cases starts inside the vehicle.

Cameras / recording devices are everywhere and this technology plays a key role in crime prevention, public safety, security, and accountability throughout the world. Cameras / recording can be an effective deterrent as part of any crime prevention strategy, especially when you can identify and narrow down the environment where cameras / recording can be most effective. In regards to the prevalence of Uber's sexual assault / misconduct patterns and high-risk factors, identifying the environment where cameras / recording would be most effective is narrowed down significantly to inside the vehicles using the Uber platform.

Uber has impressive technology that has been leveraged to grow its business, and it has identified that technology can be leveraged as part of Uber's commitment to safety. Given the prevalence of sexual assault / misconduct on the Uber platform, and the identified high-risk factors, cameras / recording to monitor driver and passenger conduct is necessary for preventing offender desire and opportunity. While Uber now has a limited recording option on the Uber platform, Uber has rejected efforts to mandate the use of cameras / recording on the Uber platform as part of its prevention / Response strategy. To be most effective at preventing sexual assault / misconduct, cameras should be mandatory, should record both audio and video, and footage should not be entirely within the Uber driver's control.

In one Uber communication that I reviewed, the use of dashcams was downplayed out of concern for cost. In the message dated 11/03/2015, an Uber employee indicates concern for any rules requiring cameras as it would be a "huge detriment to our ability to build supply effectively / cost efficiently, so it is worth treading lightly here."⁸⁴

In my review of Uber related material, it is apparent there has been significant discussion regarding the value of cameras / dashcams in vehicles. In an Uber Sexual Assault / Misconduct Reduction Strategy memo dated 6/21/2017, Uber identifies the value of using more technology in their efforts to prevent sexual assault / misconduct.⁸⁵

In an Uber communication regarding Dashcam and Audio Recording Policy Guide, dated 12/11/2018, Uber shares information regarding Uber camera and audio recording pilot sites that were launched in the US (Florida, Texas, and Tennessee) and LatAm (Dominican Republic, Brazil, and Mexico), to measure the impact that in-ride recording features could have on safety. Despite the positive data from this test showing an 11% decrease in safety incidents, the policy guide indicates that Uber does not support regulations requiring cameras.⁸⁶

In an Uber Email message dated 10/19/2022, between Uber employees discussing the value of dashcams at test sites, an Uber employee states: "In other words, drivers with dashcam on VIP are 27% less likely to experience SA/SM IPC." "We should absolutely double down on this program."⁸⁷

⁸⁴ UBER_JCCP_MDL_001739175.

⁸⁵ UBER_JCCP_MDL_00323152

⁸⁶ UBER_JCCP_MDL_000157026

⁸⁷ UBER000074783

Despite the common-sense use of cameras / recording in prevention and public safety, and the value that Uber identified specific to the Uber platform, there has only been some test sights. There is no mandatory use of cameras to enhance prevention and accountability for sexual assaults / misconduct and the associated high-risk factors on the Uber platform, putting Riders/consumers at greater risk.

7. Implement an easy and clear process of reporting drivers.

Uber knows that incidents of sexual assault are underreported and cites to this fact in its Safety Report acknowledging that sexual assault is also one of the most under-reported crimes in the US generally, with some researchers believe that nearly 3 out of every 4 sexual assaults go unreported to the police. In fact, researchers on behalf of the US Department of Justice found multiple reasons why survivors chose not to report to police between 2005 and 2010.⁸⁸ Uber also knew that there was a high likelihood of underreporting of incidents and behaviors on the platform.⁸⁹ Uber in its Safety Report asserts that it makes every effort to mitigate under-reporting by increasing reporting mechanisms and reducing barriers to reports.⁹⁰ However, Uber acknowledged internally that there was a high likelihood of underreporting of incidents and behaviors on its platform – “due to unintuitive reporting feedback flows, societal influences, and a prevalent belief that we will not act on the information.”⁹¹

Uber’s implementation of an easy and clear process to report drivers would provide Uber with a better understanding of the prevalence of sexual assault / misconduct, enhance safety and create greater opportunity for offender accountability, which thereby makes the platform safer.

8. Monitor and Assess the results of prevention efforts to enhance safety and prevention of sexual assault and misconduct on the Uber platform.

As previously explained, crime prevention can be further enhanced through collaborative problem-solving tools such as SARA to ensure that all steps are taken to prevent crimes. The last tenet or step of SARA, Assessment, pertains to collecting data and performing assessment to determine the effectiveness of Responses in reducing and/or eliminating the totality and prevalence of the problem to enhance public safety. It is important to look for and correct any unintended consequences from all of the Responses.

For all of these reasons, as previously explained, Uber can prevent or reduce the risk of drivers engaging in sexual assault / misconduct By fully implementing these tools and engaging Riders/consumers in prevalence of sexual assault / misconduct, it is more likely than not that Uber could prevent drivers from committing sexual assault / misconduct on Uber Riders on the Uber platform.

⁸⁸ Uber U.S. 2017-2018 Safety Report at p. 62.

⁸⁹ Uber_JCCP_MDL_000251111 at 0005

⁹⁰ Uber U.S. 2017-2018 Safety Report at p. 47.

⁹¹ Uber_JCCP_MDL_000251111 at 0005

C. It is more likely than not that Uber’s conduct increased the risk that Uber Riders would be subject to sexual assault / misconduct committed by Uber drivers on the Uber platform.

While Uber’s safety efforts have evolved, and it has identified many “safety features,” Uber has neglected an important first step in crime prevention and problem solving – public awareness and engagement. Prevention efforts are uninformed without community awareness and engagement.

Director Nilles’ testimony appears to agree with the importance of awareness,⁹² and Uber took a first step in increased awareness by publishing three safety reports explaining: “we believe it’s time for a new approach. Keeping this information secret doesn’t make anyone safer.”⁹³

Despite this and as explained throughout this report, Uber has not communicated or warned Uber Riders/consumers of the totality and prevalence of sexual assault / misconduct, and the Uber identified high-risk factors for sexual assault / misconduct occurring on the Uber platform.

Uber’s actual internal data was not disclosed in its Safety Report and has only been disclosed for the first time in this litigation. Uber released data for all twenty-one sexual assault / misconduct categories. Unlike Uber’s safety reports that only included what Uber classified as the five most serious sexual assault reports, this new data includes the other sixteen categories of sexual assault / misconduct; all twenty-one categories not previously released. This data shows the prevalence and totality of sexual assault / misconduct occurring on the Uber platform: 546,196 reports of sexual assault / misconduct incidents in the United States across all twenty-one categories occurring on the Uber platform for the time period 2017 – 2024.⁹⁴

This yearly data indicates that the daily number of sexual assault / misconduct incidents reported on the Uber platform every day from 2017 – 2024 in the U.S. averages 186.93 incidents a day, and the frequency of these reports indicates that there are an average of 7.789 reports of sexual assault / misconduct on the Uber platform in the U.S. every hour.

Crime prevention and problem-solving efforts are enhanced with community awareness and engagement. Public awareness and engagement can assist Uber in fully implementing more effective Responses that could enhance prevention and safety.

If Uber Riders/consumers hear repeated assurances of safety on the Uber platform, without knowledge of the reality, Riders/consumers are less likely to engage Uber safety features resulting in Uber safety features being ineffective as a prevention Response. If Riders/consumers are made aware of the totality and prevalence of sexual assault / misconduct, and the high-risk factors that

⁹² Nilles 6/30/25 Depo. at 88:6-16 (“Uber knows that an important part of reducing sexual assault at large is to focus on awareness, education, for all the people that are involved from the beginning to the end, including employees, drivers, and riders.”)

⁹³ <https://www.uber.com/us/en/about/reports/us-safety-report/>

⁹⁴ *In re Uber Technologies, Inc., Passenger Sexual Assault Litigation*, (Case No.: 3:23-MD-03084 CRB) Incident Report Classification of Dominant Tickets for 2017-2024.

Uber has identified, they will be better informed to make decisions for their own safety, and it is very likely that they will pay closer attention and engage with Uber's efforts at developing "safety features."

Uber should be transparent about the actual risks of riding and the limitations of features marketed on keeping women safe. Eliminating misleading assurances of safety, including the deficiencies identified in the screening process to eliminate bad actors must be looked at through a more objective lens. While Director Nilles testified that she believes Uber's current background process does "a very thorough job," the totality and prevalence of sexual assault / misconduct on the Uber platform, and the identified sexual assault / misconduct high-risk factors suggest otherwise.

When safety is a priority an effective background and screening process should at least include an actual background investigation into the applicant's personal and work history, place of birth, address history (including outside the U.S. / criminal history), employment history, references, previous employment checks, applicant interview, fingerprint supported criminal record checks that also verifies identification of the applicant and other employment requiring fingerprinting. All of which should ultimately be done to reduce driver opportunity to commit sexual assault / misconduct by eliminating bad actors/offenders in the background screening process. By not removing the driver's opportunity, Uber leaves its Riders at risk.

For all of the reasons previously explained in detail in this report, I hold the opinions that it is more likely than not:

- Uber put its Riders at greater risk of experiencing sexual assault and sexual misconduct committed by Uber drivers on the Uber platform;
- Uber amplified its Rider vulnerability by not disclosing the true risk of sexual assault / misconduct committed by Uber drivers on the platform;
- Uber amplified its Rider vulnerability by not disclosing the high-risk factors / circumstances it knew increased the risk of Riders being sexually assaulted by Uber drivers;
- Uber amplified its Rider vulnerability by providing misleading assurances of safety; and
- Uber amplified its Rider vulnerability by not effectively screening out bad actors / offenders as Uber drivers.

Schedule and Exhibits to this Report

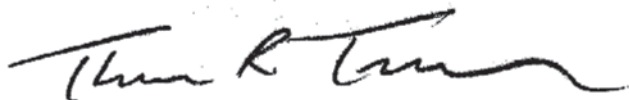
Attached as Schedules A.1, A.2, A.3, and A.4 are my case-specific opinions for Plaintiff's J.D., B.L., A.R., and B.M., respectively.

Attached as Exhibit A is a copy of my current curriculum vitae and a list of all publications I have authored in the past 10 years.

Attached as Exhibit B is a list of data or other information I have considered in forming the opinions expressed herein.

Attached as Exhibit C is a list of all cases in which I have testified as an expert at trial or by deposition during the past four years.

Attached as Exhibit D is a statement of compensation.



Thomas R. Tremblay

Thomas Tremblay Consulting & Training

09/26/2025

Date

EXHIBIT A

Thomas R. Tremblay

Curriculum Vitae

16605 Lake Circle Drive #337, Fort Myers, FL 33908

Cell: 802-999-2953 / tremblay.trt@gmail.com

Professional Summary

Proven executive leader having served as the State of Vermont's Public Safety Commissioner, and Chief of Police for the City of Burlington, VT during a distinguished thirty-year career in policing service. Passionate leader for prevention and reforms to address domestic and sexual violence. Culturally competent professional with high ethical standards. Innovator in community policing, problem solving and crime prevention. Now a national advisor and trainer specializing in leadership, prevention, and reforms to address gender-based violence.

Employment

Thomas Tremblay Consulting & Training, Self-employed, *January 2007- Present*

Leadership – Prevention – Reforms; to address gender-based violence by promoting trauma-informed, victim-centered, and offender-focused approaches. National advisor and trainer to law enforcement, domestic and sexual violence coalitions, victim service providers, prosecutors, higher education / Title IX, U.S. Military, and government and private sector employers. Contracted as a Subject Matter Expert on Sexual Assault and Domestic Violence by clients including the International Association of Chiefs of Police (IACP), the Police Executive Research Forum, Alliance for Hope International, End Violence Against Women International, the Rape Abuse Incest National Network, RTI Sexual Assault Kit Initiative, and the U.S. Department of Justice (DOJ) Civil Rights Division and Office on Violence Against Women. Provided 400 plus consultation and training projects throughout the United States, Canada, and most recently Romania. Services include litigation consultation for DOJ investigations involving reports of unlawful gender discrimination by law enforcement agencies in domestic violence and sexual assault response, and independent monitoring services for DOJ agreements with law enforcement agencies following findings of unlawful gender discrimination.

Commissioner, Vermont, Department of Public Safety; *January 2008 – January 2011*

Direct report and advisor to the Governor on public safety, homeland security, and legislative issues, including work with the Vermont Legislature. Responsible for leadership, policy development and management of the Department of Public Safety; Vermont State Police; Vermont Homeland Security; Emergency Management; Fire Safety, and Criminal Justice Services including the Vermont Crime Information Center, Sexual Offender Registry, and Forensic Crime Lab. Oversight of 600 employees providing statewide public safety services, including special response teams, with a budget totaling \$98M.

Police Chief, Burlington, Vermont Police Department; *October 2003 – January 2008*

Direct report to the Mayor and Burlington Police Commission. Responsible for leadership, management and supervision of a department of 140 employees with a budget totaling \$12M. Development and execution of strategic plans and goals for community policing and problem solving for the city and international airport. Promoted strong partnerships with campus, hospitality, business, and neighborhood districts, crime victim service providers, state domestic and sexual violence coalitions, and youth programs.

Burlington, Vermont Police Department; June 1983 – January 2008

Started career as Patrol Officer and promoted through the ranks serving as Detective; Director of the Sexual Assault / Child Sexual Abuse Investigation Unit; Patrol Sergeant; Detective Sergeant; Internal Affairs Investigator / Director; Lieutenant; Deputy Chief (including responsibilities as City Emergency Management Director), and Chief of Police. Additional duties as state certified instructor in Criminal Law; Child Sexual Abuse and Sexual and Domestic Violence Investigations; Crime Victim Services; Police Ethics; and Interview and Interrogation.

Education

- Bachelor of Science, Criminal Justice, Champlain College, Burlington, Vermont, 2007
- FBI Law Enforcement Executive Development, Albany, New York, October, 2000
- Police Executive Research Forum – Senior Management Institute, Boston, MA, June, 2000
- FBI National Academy, 183rd Session, Federal Bureau of Investigation, Quantico, VA, 1995
- Vermont Police Academy, Criminal Justice Training Council, Pittsford, VT, August, 1983
- United States Army Military Police School, Fort McClellan, AL, December, 1979
- Mount Mansfield Union High School, Jericho, Vermont, June, 1979

Related Career Experience

Director of Burlington Police Department Sexual Assault Investigation Unit. Responsible for the creation of a multi-disciplinary prevention and response team for crimes of sexual violence and child sexual abuse. The success of this unit led to a county-wide unit; Chittenden Unit for Special Investigations (CUSI) which has been a national multi-disciplinary model for prevention and response, 1986-1991.

Public Speaking / Training: Leadership, Sexual Assault, Child Sexual Abuse, Domestic Violence, Stalking, Criminal Law and Procedure, Interview and Interrogation, Crime Prevention, Community Policing, Working with the Media, Cultural Competency in Law Enforcement and Bias-Free Policing, 1986-2011.

Commissioner's Award, Vermont Department of Children and Families, for outstanding efforts in the prevention and investigation of child sexual abuse, 1988.

International Association of Chiefs of Police Community Policing Award, awarded to the Burlington Police Department, VT, 2001, while assigned as Deputy Chief of Police Operations.

International Association of Chiefs of Police Conference Presenter, "Community Policing Post 9-11," Philadelphia, PA, 2003.

International Association of Chief of Police Conference Presenter, "Innovative Police Recruitment Strategies," Los Angeles, CA, 2004.

International Police / Public Safety Exchange: Drug Prevention Program for Siberian Youth, Irkutsk, Russia, December 2002 – May 2003; National Guard State Partnership Program – Crisis Management, Skopje, Macedonia, June, 2008; Dakar, Senegal, May 2010.

Related Career Experience Continued

National Center for Crime Victims (NCVC) / Vermont Center for Crime Victims Services; Parallel Justice Program, Burlington Police. Oversaw the development of a national model for improved services for crime victims, 2003-2008.

Vermont White Ribbon Campaign Founding Member / Board Member, encouraging male leadership and prevention for violence against women crimes, 2006 – present.

International Association of Chiefs of Police Sex Offenders in the Community: Enforcement and Prevention Strategies Guidebook. Contributor in the creation of nationally distributed guidebook, September 2007.

Vermont Special Investigation Units Policy Board, board member with oversight of statewide Special Investigative Units for Sexual Assault / Child Sexual Abuse –member, 2007-2011.

International Association of Chiefs of Police National Leadership Institute on Violence Against Women, selected faculty member of national leadership initiative for Police leaders for prevention and response to Violence Against Women Crimes; Domestic Violence, Sexual Assault, and Stalking, including police perpetrated domestic and sexual violence. 2007- present.

Martin Luther King Jr. Social Justice Leadership Award, Greater Burlington, VT Multicultural Center, 2008.

Vermont Criminal Justice Training Council, Council member responsible for oversight of Vermont Law Enforcement Training Academy, 2008-2011.

Vermont Law Enforcement Advisory Board, Ex Officio, responsible for advising the Vermont Legislature and Governor on Public Safety and Criminal Justice Services initiatives, policies, and related laws, 2008 – 2011.

Improved Statewide Sexual Violence Response System, assisted Vermont State Government / Legislature in creating improved statewide child sexual abuse and sexual violence response system, including development of regional community coordinated Special Investigative Units throughout the state, 2009 - 2011.

Created Statewide Model Policy for Prevention and Response to Domestic Violence by Police Officers, Vermont Law Enforcement Advisory Board, 2010.

Sherman T. Martin Police Leadership Award, Unwavering Dedication and Outstanding Public Safety Leadership, Vermont Police Chiefs Association, 2010.

IACP: Addressing Sexual Offenses and Misconduct by Law Enforcement – Executive Guide, reviewer consult and contributor for national publication, 2010.

IACP: National Law Enforcement Training Video: “Bringing Sexual Assault Offenders to Justice.” Presenter in nationally distributed training video and guidebook, August 2011.

HOPE Works Board Member, Burlington, VT. Sexual Violence Advocacy, Crisis Counseling, Education, Outreach and Prevention, 2012 – 2013.

Related Career Experience Continued

Laura Kate Winterbottom Foundation Board Member, Burlington, VT; carrying on the legacy of Laura's love for art, nature, and teaching children, as well as her compassion for the less fortunate; and to eliminating the sexual violence that took her life, 2008 – 2016.

Laura Kate Winterbottom Foundation, *Laura's Spirit Award*, Burlington, VT; Award recipient for local, regional, and national efforts for sexual violence prevention, 2013.

White House Task Force, National Center for Campus Public Safety, development of a new curriculum for Trauma-Informed Sexual Assault Investigations and Adjudications specific for Colleges and Universities across the country, 2014.

End Violence Against Women International, 2022 Visionary Award Recipient: designed to recognize individuals for their vision and leadership in ending violence against women, 2022 – “for his bold vision, courageous leadership, honor, integrity, empathy, selfless advocacy, and generous partnership.”

Litigation Case Consultations

April – May, 2012, Law Office of McNeil, Leddy & Sheahan, Burlington, VT. Law enforcement management and supervision litigation case review and consultation. (Defendant)

November, 2012, Law Offices of Clark, Werner & Flynn P.C., Burlington, VT. Child sexual abuse / public safety litigation case review and consultation (Plaintiff).

June 2013 – June 2015, U.S. Department of Justice, Missoula Police Department, Missoula, MT, Independent Monitor. U.S. DOJ Agreement to resolve findings regarding unlawful gender discrimination in sexual violence response in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

June 2013 – June 2015, U.S. Department of Justice, University of Montana Police Department, Missoula, MT, Independent Monitor. U.S. DOJ Agreement to resolve findings regarding unlawful gender discrimination in sexual violence response in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

May, 2015, Saul Ewing Law Firm, *John Doe 6 v. Pennsylvania State University, Second Mile, Gerald Sandusky* (U.S. District Court, Eastern District of Pennsylvania). Child sexual abuse litigation case review and consultation (Defendant).

Litigation Case Consultations Continued

June - December, 2016, U.S. Department of Justice Civil Rights Division, Chicago Police Department, Chicago, IL. Subject matter expert litigation services, officer involved domestic violence and sexual misconduct, and unlawful gender discrimination.

July 2017, Law Office of Loevy & Loevy, *McGuire v. Cory Cooper, et al.* (U.S. District Court, District of Nebraska, No. 8:16-cv-00004). Litigation services law enforcement sexual misconduct, retained/deposed (Plaintiff).

September 2021 – March 2023, U.S. Department of Justice Civil Rights Division, Louisville Metro Police Department, Louisville, KY. Subject matter expert litigation services officer involved domestic violence, sexual misconduct, and unlawful gender discrimination.

May 2022, Everett Cook Law Office: *Rodgers v. Valley County, Luke Strommen, & John Does 1-3* (U.S. District Court, District of Montana, Great Falls Division, No. 4:20-CV-00105). Litigation services law enforcement sexual misconduct, retained (Plaintiff).

October 2022 Everett Cook Law Office: *Bilbruck v. Valley County, Luke Strommen, & John Does 1-3*, U.S. District Court, District of Montana, Great Falls Division, Cause No. CV-21-40-GF-BMM). Law enforcement sexual misconduct litigation services, retained (Plaintiff).

December 2022 – November 2024, U.S. Department of Justice Civil Rights Division, Worcester Police Department, Worcester, MA. Subject matter expert litigation services, sexual assault, officer involved sexual misconduct, and unlawful gender discrimination.

May 2024 – Present, U.S. Department of Justice Civil Rights Division, U.S. V. Police Department of Baltimore City, MD., Consent Decree, subject matter expert litigation services, sexual assault and police officer involved sexual misconduct.

March 2025 – Present, Williams Hart & Boundas LLP, Houston, TX: Matter of Uber Technologies, Inc., Passenger Sexual Assault Litigation, U.S. District Court, Northern District of California, San Francisco Division, No. 3:23-md-03084-CRB. Sexual assault prevention and accountability, retained (Plaintiff).

2025 Consultation and Training

May 2024 – Present, U.S. Department of Justice Civil Rights Division, U.S. V. Police Department of Baltimore City, MD., Consent Decree, subject matter expert litigation services, sexual assault and police officer involved sexual misconduct.

January 16 – 24, 2025, Necuvinte Association, Romania Parliament, Bucharest, Romania. Improving National Justice System Response to Sexual Assault and Gender-Based Violence.

January 28 – 30, 2025, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

March 25 – 27, 2025, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

April 14 – 15, 2025, U.S. Department of Interior, National Advocacy Center, Columbia, SC. Indian Country Violent Crime Investigations Seminar: Trauma-Informed Response to Domestic and Sexual Violence.

April 18, 2025, Washington State Department of Health Medical Commission, Seattle, WA. Sexual Misconduct Analysis Review Team Consultation and Training, Trauma-Informed Sexual Misconduct Investigation and Adjudications.

April 22 – 24, 2025, End Violence Against Women International Annual Conference, Anaheim, CA. Curriculum development consultation. Workshop presentations: Law Enforcement Sexual Misconduct Prevention and Accountability, “Ask and Expert:” Violence Against Women Leadership Consultation.

May 19 – 22, 2025, Conference on Crimes Against Women, Dallas, TX. Conference Plenary Keynote Presentation: “Gabby Petito Foundation – Tragedy into Purpose,” with Nichole Schmidt and Tara Petito. Workshop presentations: “Preventing Gender Bias in Police Response to Sexual and Domestic Violence;” “Law Enforcement Sexual Misconduct Prevention and Accountability;” “Case Study: Cold Case Rape and Murder – 51 Years – Two Generations of Cops – Case Closed.”

June 3 – 5, 2025, El Dorado Police Department, El Dorado, KS. Trauma-Informed Sexual Assault Response consultation and training.

June 24 – 25, 2025, NOVA Southeastern University, Davie, FL. Campus Trauma-Informed Sexual Assault Investigations consultation and training.

2024 Consultation and Training

December 2022 – November 2024, U.S. Department of Justice Civil Rights Division, Worcester Police Department, Worcester, MA. Subject matter expert litigation services, unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

January 7 – 18, 2024, Northern Marianas Coalition Against Domestic and Sexual Violence, Saipan, Rota, and Tinian, CNMI. Sexual Assault Response Team: Trauma-Informed Sexual Assault Consultation and Training

January 30 – 31, 2024, U.S. Department of Justice National Advocacy Center, Columbia, SC. Indian Country Violent Crime Investigations Consultation and Training.

February 14 – 15, 2024, Washington Department of Health Medical Commission, Tumwater, WA. Sexual Misconduct Analysis Review Team Training, Trauma-Informed Sexual Misconduct Adjudication Consultation and Training.

March 12 – 13, 2024, Western Kansas Child Advocacy Center, Scott City, KS. Trauma-Informed Sexual Assault Investigations Consultation and Training.

April 1 – 3, 2024, End Violence Against Women International Annual Conference, San Diego, CA. Conference Plenary Session: “Closing a 51 Year Old Rape and Murder Case – Examining the Cycle of Justice;” Workshop: “Law Enforcement Sexual Misconduct Prevention and Accountability.”

April 9 – 11, 2024, U.S. Department of the Interior, National Park Police, Yellowstone National Park. First Responders to Violent Crime, Federal Law Enforcement Training.

April 23, 2024, Vermont Children’s Alliance Board, Vermont Child Advocacy Center, and Vermont Special Investigations Unit, annual meeting, Warren, VT. Leadership and Strategic Planning Consultation.

May 1 – 2, 2024, Wisconsin Department of Justice, Office of Crime Victim Services, Madison, WI. Trauma-Informed Sexual Assault Investigations Consultation and Training.

May 14 – 16, 2024, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

June 25 – 26, 2024, Louisiana State University Police, Baton Rouge, LA. Trauma-Informed Sexual Assault Investigations Consultation and Training.

September 18, 2024, National Training Center on Crimes Against Women, Dallas, TX. Police Chiefs Leadership Institute on Violence Against Women Crimes.

2024 Consultation and Training Continued

October 10, 2024, Washington State Department of Health Medical Commission, Seattle, WA. Sexual Misconduct Analysis Review Team Consultation and Training, Trauma-Informed Sexual Misconduct Investigation and Adjudications.

October 22 – 24, 2024, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

November 12 – 13, 2024, U.S. Department of the Interior, National Indian Programs Training Center, Albuquerque, NM. First Responder to Violent Crime in Indian Country – Trauma-Informed Response to Domestic and Sexual Violence.

2023 Consultation and Training

November 2020 – June 2023, Chicago Police Department, Chicago IL. Technical assistance project, gender bias prevention, improving criminal justice system response to domestic violence, sexual assault, and officer involved domestic violence and sexual misconduct.

September 2021 – March 2023, U.S. Department of Justice Civil Rights Division, Louisville Metro Police Department, Louisville, KY. Subject matter expert, officer involved domestic violence and sexual misconduct litigation consultant services.

December 2022 – November 2024, U.S. Department of Justice Civil Rights Division, Worcester Police Department, Worcester, MA. Subject matter expert litigation services, unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

February 17, 2023, Washington State Department of Health Medical Commission, Seattle, WA. Sexual Misconduct Analysis Review Team Training, Trauma-Informed Sexual Misconduct Investigation and Adjudication Training.

March 7 – 8, 2023, New Mexico Department of Public Safety, Sante Fe, NM. Trauma-Informed Sexual Assault Kit Initiative (SAKI) Cold Case Investigations Training.

March 15 – 22, 2023, Northern Marianas Coalition Against Domestic and Sexual Violence, Saipan, CNMI. Sexual Assault Response Team consultation and training: prevention, response, and investigation.

April 10 – 13, 2023, End Violence Against Women International Conference presenter, Chicago, IL. Workshop, “Reimaging Justice: The Power of Survivor Voices In L.E. Response to Gender-based Violence;” “Public Trust L.E. Sexual Misconduct Prevention and Accountability.”

April 26 – 27, 2023, Muckleshoot Indian Tribe Victim Services, Auburn, WA. Trauma-Informed Sexual Assault Investigations Training.

2023 Consultation and Training Continued

May 10 - 11, 2023, Washington Department Of Health Investigators Training, Olympia, WA. Sexual Misconduct Analysis Review Team Training, Trauma-Informed Sexual Misconduct Investigation and Adjudication Training.

May 30, 2023, U.S. Department of Justice, webinar. Investigating and Prosecuting Federal Sexual Assault Cases: Boats, Planes, Prisons, Parks, and Indian Country.

June 6 – 7, 2023, Fair Haven Rape Crisis Center, Highland, IN. Trauma-Informed Sexual Assault Investigations Consultation and Training.

June 20 – 22, 2023, Colorado Springs Police Department, Colorado Springs, CO. Trauma-Informed Sexual Assault Interview and Investigations Consultation and Training.

September 19 – 22, 2023, U.S. Department of Justice, National Advocacy Center, Columbia, SC. First Responders to Violent Crime: Federal Law Enforcement Training.

October 3 – 5, 2023, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

November 14 – 16, 2023, New York City Police Department, Special Victims Division, NYPD Academy, Queens NY. Trauma-Informed Adult Sexual Assault Interview & Investigations Consultation and Training.

December 10 – 11, 2023, Site visit, U.S. Department of Justice Civil Rights Division, Worcester Police Department, Worcester, MA. Subject matter expert litigation services, unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

2022 Consultation and Training

March 2020 – March 2022, International Association of Chiefs of Police, Collaborative Reform Initiative-Technical Assistance Center (CRI-TAC), San Antonio Police Department, San Antonio, TX. Technical assistance project, Enhancing Domestic Violence Response, Investigation and Prosecution.

November 2020 – Present, Chicago Police Department, Chicago IL. Technical assistance project, gender bias prevention, improving criminal justice system response to domestic violence, sexual assault, and officer involved domestic violence and sexual misconduct.

September 2021 – Present, U.S. Department of Justice Civil Rights Division, Louisville Metro Police Department, Louisville, KY. Subject matter expert officer involved domestic violence and sexual misconduct litigation consultant services.

February 2 – 3, 2022, Waco Police Department, Waco, TX, Trauma-Informed Sexual Assault Investigations Training.

2022 Consultation and Training Continued

February 21 – 25, 2022, Overland Park Police Department, Overland, Park, KS. Trauma-Informed Sexual Assault Consultation and Training.

March 8 – 10, 2022, New York City Police Department, Special Victims Division, Queens, NY. Trauma-Informed Sexual Assault Interview and Investigations Training.

March 29 – 30, 2022, Stowe Police Department / New England Police Chiefs Association, Stowe, VT. Trauma-Informed Sexual Assault Investigations Training.

April 19 – 21, 2022, End Violence Against Women International Conference – Reimagining Justice, San Francisco, CA. Conference opening keynote, “Justice Begins With a Trauma-Informed Approach: Reflections and Vision.”

May 11 – 12, 2022, Colorado Springs Police Department, Colorado Springs, CO. Trauma-Informed Sexual Assault Special Victims Response Certification.

June 8 – 9, 2022, The Friendship Center of Helena, Helena, MT. Trauma-Informed Sexual Assault Investigations Training.

June 24 – 25, 2022, Oregon Medical Board, Oregon State Board of Nursing, Oregon Board of Physical Therapists, and Oregon Board of Chiropractic Examiners, Portland, OR. Trauma-Informed Sexual Misconduct Investigations & Adjudications Consultation and Training

August 2 – 4, 2022, Title IX Solutions, Virtual Conference, Trauma-Informed Victim / Complainant Interview Training

September 8 – 9, 2022, Amarillo College Criminal Justice Program, Amarillo, TX. Trauma-Informed Sexual Assault Investigations Training.

September 13, 2022, East Central University STTAABLE), Webinar. Identifying and Preventing Gender-Bias to Improve Campus Response to Sexual Assault and Domestic Violence.

September 22, 2022, Washington State Criminal Justice Training Center, Burien, WA. Sexual Assault Investigations Summit keynote: Start by Believing It’s Benefit to Thorough Investigations and Community Coordinated Response.

September 26 – 28, 2022, Lake Family Resource Center, Lake County, CA. Community Partners Presentation: Justice Begins with a Trauma-Informed Approach: Reflection and Vision. Trauma-Informed Sexual Assault Investigations and Prosecution Consultation and Training.

October 11 – 13, 2022, New York City Police Department, Special Victims Division, Queens, NY. Trauma-Informed Sexual Assault Interview and Investigations Training.

October 25 – 26, 2022, U.S. Department of the Interior, Columbia, SC. Domestic Violence and Sexual Assault First Responder Curriculum Development Consultation.

November 3, 2022, U.S. Department of the Interior, Flagstaff, AZ. Domestic Violence and Sexual Assault First Responder Training Video Production and Recording Consultation.

2021 Consultation and Training

January – June, 2021, Baylor University Police Department, Waco, TX. Technical assistance project to improve sexual assault response and investigations, including case review consultation (year 5).

March 2020 – March 2022, International Association of Chiefs of Police, Collaborative Reform Initiative-Technical Assistance Center (CRI-TAC), San Antonio Police Department, San Antonio, TX. Technical assistance project, Enhancing Domestic Violence Response, Investigation and Prosecution.

November 2020 – Present, Chicago Police Department, Chicago IL. Technical assistance project, gender bias prevention, improving criminal justice system response to domestic violence, sexual assault, and officer involved domestic violence and sexual misconduct.

March 18, 2021, Maryland Coalition Against Sexual Assault, Virtual Training, “Enhancing a Trauma-Informed Approach to Domestic and Sexual Violence Victims in the Black Community.” Joint presentation in partnership with Ujima, Inc

April 8, 2021, End Violence Against Women International Virtual Conference presentation, “Model Policy Resource: Law Enforcement Sexual Misconduct Prevention and Accountability.”

April 12 – 13, 2021, Kansas Coalition Against Domestic and Sexual Violence Virtual Preconference Institute, 23rd Annual Kansas Crime Victims Rights Conference. Training, “Justice Begins with a Trauma-Informed Response-Why the Neuroscience Matters and What To Do With It.” In partnership with Dr. Jim Hopper.

May 5 – 6, 2021, International Virtual Summit, Safe and Together Institute, “Restoring Trust: Ending Officer-Involved Domestic Violence,” conference keynote presentation: “Confronting Officer Involved Domestic Violence – Officers Who Choose to Abuse.”

May 18, 2021, Dallas Conference on Crimes Against Women, Virtual Conference, presentation: “Public Trust: Confronting Police Sexual Misconduct in the #MeToo Era.”

May 24, 2021, Dallas Conference on Crimes Against Women, Virtual Conference, presentation: “Enhancing Response to Domestic and Sexual Violence Victims in the Black Community,” in partnership with Ujima National Center on Violence Against Women in the Black Community.

June 18, 2021, Kansas District Attorneys Association Annual Conference, Virtual training, “Domestic Violence and Sexual Assault: Enhancing a Trauma-Informed Criminal Justice Approach for Prosecutors.”

June 23 – 24, 2021, Fairhaven Rape Crisis Center, Indiana SART, Hammond, IN. “Trauma-Informed Sexual Assault Investigations Training.”

July 14 – 15, 2021, University of South Carolina Police Department, Columbias, SC. “Trauma-Informed Sexual Assault Investigations: Enhancing Criminal Justice Response on Campus.”

August 18, 2021, International Association of Chiefs of Police, Collaborative Reform Initiative-Technical Assistance Center (CRI-TAC), San Antonio Police Department, San Antonio, TX. “Domestic Violence Suspect Interview Training.”

2021 Consultation and Training Continued

2021 – September 2022, U.S. Department of Justice Civil Rights Division, Louisville Metro Police Department, Louisville, KY. Subject matter expert officer involved domestic violence and sexual misconduct litigation consultant services.

September 1, 2021, International Association of Chiefs of Police, Collaborative Reform Initiative-Technical Assistance Center (CRI-TAC), San Antonio Police Department, San Antonio, TX. “Domestic Violence Suspect Interview Training.”

September 13, 2021, Colorado Organization for Victim Assistance Virtual Conference. “The Anatomy of a Trauma-informed Approach to Sexual Assault: Setting the Stage for Success”

September 15 – 16, 2021, Lake Family Resource Center, Lake County, CA. “Trauma-Informed Sexual Assault Investigations: Trauma-Informed, Victim Centered, Offender Focused.”

September 22, 2021, ECU STTAABLE Campus Safety Program, Webinar. “Internal and External Review of Gender Based Violence Cases on Campus: Recalibrating Investigations.”

September 29 – 30, 2021, Maysville Community and Technical College, Morehead, KY. “Trauma-Informed Sexual Assault Investigations Training.”

October 13 – 14, 2021, Family Services / Dutchess County Sheriff’s Office, Poughkeepsie, NY. “Trauma-Informed Domestic and Sexual Violence Investigations”

October 27 – 28, 2021, Family Services / Dutchess County Sheriff’s Office, Poughkeepsie, NY. “Trauma-Informed Domestic and Sexual Violence Investigations”

November 3 – 5, 2021, New York City Police Department, Special Victims Division, New York City Police Academy, Queens, NY. “Trauma-Informed Sexual Assault Interviews and Investigations: Trauma-Informed, Victim-Centered, Offender-Focused.”

November 17 - 19, 2021, New York City Police Department, Special Victims Division, New York City Police Academy, Queens, NY. “Trauma-Informed Sexual Assault Interviews and Investigations: Trauma-Informed, Victim-Centered, Offender-Focused.”

December 1 - 3, 2021, New York City Police Department, Special Victims Division, New York City Police Academy, Queens, NY. “Trauma-Informed Sexual Assault Interviews and Investigations: Trauma-Informed, Victim-Centered, Offender-Focused.”

December 10, 2021, Washington State Medical Commission, Seattle, WA. “Trauma-Informed Sexual Misconduct Investigations and Adjudications.”

2020 Consultation and Training

January – December, 2020, Baylor University Police Department, Waco, TX. Technical assistance project to improve sexual assault response and investigations, including case review consultation (year 4).

January 8, 2020, Vermont Board of Medical Practice, Randolph, VT. Trauma-Informed Sexual Assault / Abuse Medical Professionals Regulatory Investigations Overview.

January 11, 2020, Oregon Medical Board, Portland, OR. Trauma-Informed Sexual Assault / Abuse Medical Professionals Regulatory Investigations.

January 13, 2020, United States Merchant Marine Academy, Kings, Point NY. SAPR Training: Leadership for the Prevention of Sexual Assault.

January 23, 2020, Connecticut Police Academy, Meriden, CT. Leadership and First Line Supervisor Training: Domestic Violence, Sexual Assault, and Stalking.

January 29, 2020, United States Department of the Interior, Washington DC. Trauma-Informed Response for Domestic and Sexual Violence Victims in the Black Community. In partnership with Ujima National Center on Violence Against Women in the Black Community.

February, 2020, Publication, Model Policy Resource. Tremblay, T., Archambault, J., & Lonsway, K. (2020). *Model Policy Resource: Law Enforcement Sexual Misconduct Prevention and Accountability*. End Violence Against Women International (EVAWI).

February 4 – 5, 2020, International Association of Chiefs of Police, Nashville, TN. Trauma-Informed Sexual Assault Investigations in the Black Community. In partnership with Ujima National Center on Violence Against Women in the Black Community.

February 25 – 26, 2020, Punahou School, Honolulu, Oahu, HI. Trauma-Informed Sexual Assault: Enhancing Campus Response Training and Consultation.

March 2020 – Present, International Association of Chiefs of Police, Collaborative Reform Initiative-Technical Assistance Center (CRI-TAC), San Antonio Police Department, San Antonio, TX. Technical assistance project, Enhancing Domestic Violence Response, Investigation and Prosecution.

July 16, 2020, Institute for Community Coordinated Response, Webinar, “Courageous Conversations: Improving Our Response to Domestic and Sexual Violence Victims in the Black Community.” In partnership with Ujima National Center on Violence Against Women in the Black Community.

August 6 – 7, 2020, Title IX Solutions Inc., Virtual Training. “Title IX and Beyond: Trauma-Informed Sexual Assault Victim Interview Training.”

September 9, 2020, Family Justice Center Virtual Conference Plenary Session, “Shattering the Sexual Assault Cycle of Doubt: Victim-Centered, Trauma-Informed, Offender-Focused.”

September 17, 2020, Chicago IL Police Department, Virtual Training. “Public Trust: Investigating Law Enforcement Sexual Misconduct.”

2020 Consultation and Training Continued

October 2020 – Present, City of Chicago IL / Chicago IL Police, “Improving Criminal Justice Response to Domestic Violence, Dating Violence, Sexual Assault, and Stalking, including Officer involved Domestic Violence and Sexual Misconduct. Two-year grant project, subject matter expert.

October 1, 2020, Mississippi Association of Chiefs of Police, Biloxi, MS. “Leadership and the Prioritization of Violence Against Women Crimes: Domestic Violence, Sexual Assault, and Stalking.”

October 6, 13, 20, 2020, Douglas County Kansas District Attorney’s Office, Virtual Training. “Sexual Assault Response, Investigation, and Prosecution: Victim-Centered, Trauma-Informed, Offender Focused.”

October 16, 2020, Safe and Together Institute, Podcast, “Confronting Officer Involved Domestic Violence,” in partnership with Mark Wynn Consulting & Training.

October 23, 2020, Institute for Community Coordinated Response, Webinar, “Courageous Conversations II: Improving Our Response to Domestic and Sexual Violence Victims in the Black Community.”

November 23, 2020, End Violence Against Women International, Webinar. *"Introducing the Law Enforcement Sexual Misconduct Prevention and Accountability Model Policy Resource "*

December 1, 2020 ECU STTAABLE Campus Safety Program, Webinar. "Responding to Non-Fatal Strangulation Assault: A Trauma-Informed Approach."

December 18, 2020, Chicago IL Police, Virtual Training and Consultation. “Domestic Violence Focus and Resolve: Ensuring the Intent of the Law,” “Enhancing Partnerships: Domestic Violence Advocacy and Law Enforcement.”

2019 Consultation and Training

January – December, 2019, Baylor University Police Department, Waco, TX. Technical assistance project to improve sexual assault response and investigations, including case review consultation (year 3).

January – December 2019, Department of Justice, Office on Violence Against Women, grant award gender bias prevention pilot project: “Enhancing Community Trust: Proactive Approaches to Domestic & Sexual Violence.” Partner with the International Association of Chiefs of Police and Futures Without Violence.

January 9 – 10, 2019, International Association of Chiefs of Police, University of Kentucky, Lexington, KY. Trauma-Informed Sexual Assault Investigations training.

January – December 2019, End Violence Against Women International, research and development of Law Enforcement Sexual Misconduct Model Policy for Prevention and Accountability.

February 20 – 21, 2019, International Association of Chiefs of Police, Hoover, AL. Trauma-Informed Sexual Assault Investigations training.

2019 Consultation and Training Continued

February 27 – March 1, 2019, Hawaii Attorney General’s Office / Honolulu Police Department, Honolulu, HI. Technical assistance and training; Trauma-Informed Sexual Assault Investigations.

February 27 – March 1, 2019, Hawaii Attorney General’s Office / Honolulu Police Department, Honolulu, HI. Technical assistance and training; Trauma-Informed Sexual Assault Investigations.

March 4 – 5, 2019, University of Hawaii, Honolulu, HI. Technical assistance and training; Enhancing Campus Response to Sexual Assault.

March 7 – 8, 2019, University of Hawaii Community College, Winward Community College, Kaneohe, HI. Technical assistance and training; Enhancing Campus Response to Sexual Assault.

April 10 – 11, 2019, International Association of Chiefs of Police, Gainesville Police Department, Gainesville, FL. Technical assistance pilot site visit, Enhancing Community Trust – Proactive Approaches to Domestic and Sexual Violence.

April 16, 2019, U.S. Airforce, Hill Air Force Base, UT. SAPR presentation; “Trauma-Informed Care, Preventing Gender Bias in Sexual Assault Response.”

April 23, 2019, End Violence Against Women International Conference, San Diego, CA. Conference Plenary Session: “Courageous Conversations – Identifying and Preventing Gender Bias in Sexual Assault and Domestic Violence Response.”

April 23, 2019, End Violence Against Women International Conference, San Diego, CA. Conference Workshop: “Confronting Law Enforcement Sexual Misconduct in #MeToo Era.”

April 24, 2019, End Violence Against Women International Conference, San Diego, CA. Panel Discussion: “The Neurobiology of Trauma – The Gifts and Limits of Training Professionals”

May 1 – 2, 2019, International Association of Chiefs of Police, Warrensburg, MO. Trauma-Informed Sexual Assault Investigations training.

May 9 – 10, 2019, Clallam County Sheriff’s Department, Port Angeles, WA. Trauma-Informed Sexual Assault Investigations Training.

May 14 – 15, 2019, International Association of Chiefs of Police, Laramie Police Department, Laramie, WY. Technical assistance pilot site visit, Enhancing Community Trust – Proactive Approaches to Domestic and Sexual Violence.

May 23, 2019, U.S. Army Leadership Summit: 593rd Expeditionary Sustainment Command, Joint Base Lewis-McChord, WA. Sexual Harassment/Assault Response and Prevention (SHARP); Leadership Role in the Prevention of Gender Bias in Sexual Assault Response

2019 Consultation and Training Continued

June 11 – 14, 2019, International Association of Chiefs of Police Leadership Institute on Violence Against Women Crimes, Vermont State Police, Burlington, VT. Selected leader faculty member responsible for participation in four-day training institute for Vermont State Police law enforcement leaders on domestic violence, sexual assault, stalking and human trafficking.

June 25 – 27, 2019, New Jersey State Police, Morristown, Hamilton, and Atlantic City, NJ. Trauma-Informed Sexual Assault Response training.

June 28, 2019, International Association of Chiefs of Police, UJIMA, Alexandria, VA. Partnership curriculum development meeting for Trauma-Informed Sexual Assault Investigations – Cultural Competence – Addressing Marginalized and Underserved Communities.

July 10 – 11, 2019, International Association of Chiefs of Police, Central Bucks Regional Police Department, PA. Technical assistance pilot site visit, Enhancing Community Trust – Proactive Approaches to Domestic and Sexual Violence.

July 17 – 18, 2019, International Association of Chiefs of Police, Montgomery County, MD. First pilot project training; “Trauma-Informed Sexual Assault Investigations in the Black Community.”

July 22 – 26, 2019, International Association of Chiefs of Police Leadership Institute on Violence Against Women Crimes, Jackson, MS. Selected leader faculty member responsible for participation in four-day training institute for law enforcement leaders from around the country on domestic violence, sexual assault, stalking and human trafficking.

August 5 – 6, 2019, Michigan State University Conference, East Lansing, MI. Conference consultation and presenter, “Trauma-Informed and Victim Centered Approaches to Relationship Violence and Sexual Assault.”

August 14 – 15, 2019, International Association of Chiefs of Police, Las Vegas Metropolitan Police, Las Vegas, NV. Trauma-Informed Sexual Assault Investigations Training.

September 4 – 5, 2019, Maryland Coalition Against Sexual Assault, Goucher College, Towson, MD. Trauma-Informed Sexual Assault Investigations Training.

September 18 – 19, 2019, International Association of Chiefs of Police, Durham, NC. Trauma-Informed Sexual Assault Investigations Training.

September 24, 2019, East Central University, STTAABLE Webinar: “Confronting Law Enforcement Sexual Misconduct in the #MeToo Era.”

September 26, 2019, Northern Michigan University, Marquette, MI. Trauma-Informed Sexual Assault Response Training.

October 2 – 3, 2019, International Association of Chiefs of Police, Oneonta, NY. Trauma-Informed Sexual Assault Investigations Training.

2019 Consultation and Training Continued

October 10, 2019, Cumberland County Office of the District Attorney, Cumberland County, PA. Trauma-Informed Sexual Assault Response Training.

October 16 – 17, 2019, Kansas State Board of Healing Art, Topeka, KS. Trauma-Informed Sexual Assault Investigations/Adjudications Training.

October 29 – 31, 2019, Colorado Springs Police Department, CO. Sexual Assault Investigations Consultation and Training: Victim-Centered, Trauma-informed, Offender Focused.

November 6 – 8, 2019, Colorado Springs Police Department, CO. Sexual Assault Investigations Consultation and Training: Victim-Centered, Trauma-informed, Offender Focused.

November 20 – 21, 2019, International Association of Chiefs of Police, Rapid City, SD. Trauma-Informed Sexual Assault Investigations Training.

December 11, 2019, Washington State Medical Commission, Tumwater, WA. SMART Training: Trauma-Informed Sexual Assault / Medical Professional Abuse Regulatory Investigations training and consultation.

December 16 – 17, 2019, Baylor University Police Department, Waco, TX. Technical Assistance Site Visit and Case Consultation and Reviews.

2018 Consultation and Training

January – December, 2018, Baylor University Police Department, Waco, TX. Technical assistance project to improve sexual assault response and investigations (year 2).

January – December 2018, Department of Justice, Office on Violence Against Women, grant award gender bias prevention pilot project: “Enhancing Community Trust: Proactive Approaches to Domestic & Sexual Violence.” Partner with the IACP and Futures Without Violence.

January 2018, International Association of Chiefs of Police (IACP), Gender Bias Prevention, Law Enforcement Sexual Misconduct. Subject matter expert consultation and recommendations for updates to the IACP 2011 Executive Guide: “Addressing Sexual Offenses and Misconduct by Law Enforcement.”

February 4 – 9, 2018, Kansas Bureau of Investigation Statewide Training, Manhattan and Hutchinson, KS. Trauma-Informed Sexual Assault Investigations consultation and training.

February 15, 2018, Law Office of Loevy & Loevy, *McGuire v. Cory Cooper, et al.* (U.S. District Court, District of Nebraska, No. 8:16-cv-00004). Deposition, law enforcement sexual misconduct litigation case review and consultation, Fort Myers, FL. (Plaintiff)

February 28 – March 2, 2018, RTI Sexual Assault Kit Initiative (SAKI), Honolulu, HI. Trauma-Informed Sexual Assault Investigations consultation and training.

2018 Consultation and Training Continued

March 5 – 6, 2018, Hawai'i Office of the Prosecuting Attorney, Hilo and Kona, HI. Trauma-Informed Sexual Assault Response consultation and training.

March 20 – 21, 2018, New Kent Sexual Assault Response Team, New Kent, VA. Trauma-Informed Sexual Assault Investigations consultation and training.

March 26 – 28, 2018, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit.

April 10 – 11, 2018, West Virginia Foundation for Rape Information and Services 18th Annual Statewide Conference, Roanoke, WV. Conference keynote address: "Courageous Conversations – Preventing Gender Bias in Police Response to Sexual Assault." Conference workshops: "Sexual Assault – Justice Begins with a Trauma-Informed Approach," and "Exploring Rape Culture and Impact."

April 15 – 20, 2018, Kansas Bureau of Investigation Statewide Training, Pittsburg and Wichita, KS. Trauma-Informed Sexual Assault Investigations consultation and training.

April 24 – 25, 2018, U.S. Army SHARP, 2nd Stryker Brigade Combat Team, 2nd Infantry Division, Joint Base Lewis McChord, WA. Leadership consultation and presentation: "Exploring the Complexities of Sexual Assault and Gender Bias."

April 29 – May 8, 2018, Alaska Department of Public Safety, Alaska State Troopers, Juneau, Fairbanks, and Anchorage, AK. Trauma-Informed Sexual Assault Investigations consultation and training.

May 9, 2018, Alaska Department of Public Safety, 2018 Statewide Conference on Domestic Violence and Sexual Assault, Anchorage, AK. Conference Keynote address: "Courageous Conversations – Identifying and Preventing Gender Bias in Response to Sexual Assault and Domestic Violence."

May 16 – 18, 2018, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit, consultation and department annual training.

June 13 – 14, 2018, CNN Documentaries, New York City, NY. Subject matter expert consultation, sexual assault case reviews, and interviews for documentary on destruction of sexual assault forensic kits.

June 24 – 29, 2018, Northern Marianas Coalition Against Domestic & Sexual Violence, Saipan Northern Mariana Islands. Trauma-Informed Sexual Assault Investigations consultation and training.

July 14, 2018, End Violence Against Women International (EVAWI), webinar production. "Confronting Police Sexual Misconduct in the #MeToo Era."

July 18 – 20, 2018, International Association of Chiefs of Police, San Antonio, TX. Trauma-Informed Sexual Assault Investigations training.

2018 Consultation and Training Continued

July 29 – August 4, 2018, Kansas Bureau of Investigation Statewide Training, Hays and Garden City, KS. Trauma-Informed Sexual Assault Investigations consultation and training.

August 14, 2018, End Violence Against Women International (EVAWI), live webinar: “Confronting Police Sexual Misconduct in the #MeToo Era.”

August 20 – 22, 2018, Florida Public Safety Institute, Tallahassee, FL. Trauma-Informed Sexual Assault Investigations consultation and training.

September 9 – 15, 2018, Kansas Bureau of Investigation Statewide Training, Topeka, and Overland Park, KS. Trauma-Informed Sexual Assault Investigations consultation and training.

September 18, 2018, ECU STTAABLE Campus Program, Ada, OK, Webinar: “Trauma-Informed Care – Enhancing Law Enforcement and Advocacy Partnerships.”

September 21, 2018, Summit County OH Prosecutor’s Office, Annual Conference, “*Responding to the Needs of Victims,*” Sexual Assault - Justice Begins with a Trauma-Informed Approach, Investigative Strategies that Focus on Offender Behaviors.

September 24 – 26, 2018, RTI Virginia Statewide Sexual Assault Kit Initiative Conference, Roanoke, VA. Consultation and training.

October 7 – 9, 2018, International Association of Chiefs of Police Conference, Orlando, FL. Consultation and conference presentations: IACP TV Interview – Confronting Police Sexual Misconduct in the #MeToo Era; Enhancing Response to Sexual Assault; Global Perspective Series Panel – Confronting Police Sexual Misconduct in the #MeToo Era.

October 10 – 12, 2018, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit and consultation.

October 21 – 22, 2018, Winona State University, Winona, MN. Trauma-Informed Sexual Assault Training: Enhancing Campus Response.

October 24 – 25, International Association of Chiefs of Police, Alexandria, VA. Trauma-Informed Sexual Assault Curriculum Development – Cultural Competence – Addressing Marginalized and Underserved Communities.

October 30 – November 1, 2018, Laramie WY Police Department, Trauma-Informed Sexual Assault Investigations Consultation and Training.

November 12 – 14, 2018, WA Department of Health Investigations, WA State Medical Commission, Olympia, WA. Trauma-Informed Sexual Assault / Medical Professional Abuse Investigations training and consultation.

December 5 – 8, 2018, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit and consultation.

2017 Consultation and Training

January – December, 2017, Baylor University Police Department, Waco, TX. Technical assistance project to improve sexual assault response and investigations (year 1).

January 10 – 13, 2017, National Center for Campus Public Safety, Salem, MA. “Title IX, Trauma-Informed Sexual Assault Investigations and Adjudications Training.”

January 24, 2017, U.S. Department of Justice Office on Violence Against Women / Battered Women’s Justice Project, Washington, DC. Consultation and moderator for national dialogue on preventing gender bias in police response to sexual assault and domestic violence.

February 7, 2017, Messiah College, Mechanicsburg, PA. Trauma-informed Sexual Assault: Enhancing Campus Response, consultation and training.

February 8 – 9, 2017, West Chester University, West Chester, PA. Trauma-informed Sexual Assault Investigations: Enhancing Campus Response, consultation and training.

February 22 – 23, 2017, Buncombe County Family Justice Center, Asheville, NC. Trauma-informed Sexual Assault Investigations Training.

March, 2017, Rape Abuse Incest National Network (RAINN), Miami, FL. Subject matter expert consultation and assessment.

March 8 – 9, 2017, International Association of Chiefs of Police, Miles City, MT. Trauma-informed Sexual Assault Investigations Training.

March 14 – 17, 2017, National Center for Campus Public Safety, University of Puget Sound, Tacoma, WA. Trauma-informed Sexual Assault Investigations and Adjudications Institute.

March 22 – 23, 2017, International Association of Chiefs of Police, Philadelphia Police Special Victims Unit, Philadelphia, PA. Trauma-informed Sexual Assault Investigations Training.

March 27 – 31, 2017, Illinois Law Enforcement Training and Standards Board Executive Institute, Fair View Heights, IL. First Line Supervisor Institute on Violence Against Women Crimes.

April 19, 2017, Ending Violence Against Women International Conference, Orlando, FL. Presentation: “External Sexual Assault Review Panels: Recalibrating our Investigations.”

April 24 – 28, 2017, Illinois Law Enforcement Training and Standards Board Executive Institute, Chicago / Naperville, IL. First Line Supervisor Institute on Violence Against Women Crimes.

May 2017, Law Office of Loevy & Loevy, Litigation Consultation, *McGuire v. Cory Cooper, et al.* (U.S. District Court, District of Nebraska, No. 8:16-cv-00004)

May 1 – 4, 2017, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit.

May 9, 2017, New Hampshire Office of the Attorney General, Concord, NH. Leadership training on Violence Against Women Crimes – Domestic Violence – Sexual Assault – Stalking.

2017 Consultation and Training Continued

May 11, 2017, Connecticut Coalition Against Domestic Violence, Meriden, CT. Leadership training on Violence Against Women Crimes – Domestic Violence – Sexual Assault – Stalking.

May 17 – 18, 2017, RTI National Sexual Assault Kit Initiative (SAKI) Grantees Meeting, Arlington, VA. Presentations and subject matter expert consultation with SAKI grantees.

May 24 – 25, 2017, Alternatives to Violence of the Palouse, Inc., Pullman, WA. Trauma-informed Sexual Assault Investigations Training.

June 2017 – December 2017, Department of Justice, Office on Violence Against Women, grant award gender bias prevention pilot project: “Enhancing Community Trust: Proactive Approaches to Domestic & Sexual Violence.” Partner with the International Association of Chiefs of Police and Futures Without Violence.

June 12 – 14, 2017, University of Iowa Police Department, Iowa City, IA. Trauma-informed Sexual Assault Investigations Training.

July 2017, Law Office of Loevy & Loevy, *McGuire v. Cory Cooper, et al.* (U.S. District Court, District of Nebraska, No. 8:16-cv-00004). Law enforcement sexual misconduct litigation case review and consultation, retained/deposed. (Plaintiff)

July 11, 2017, StepStone of Kansas Domestic Violence Services, Wichita, KS. Domestic Violence & Sexual Assault Trauma-informed First Response Training.

July 24 – 26, 2017, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit.

August 8 – 9, 2017, Washington State Medical Commission, Tumwater, WA. Trauma-informed Sexual Assault / Medical Professional Abuse Investigations training and consultation.

August 14 – 17, 2017, Rape, Abuse, Incest, National Network (RAINN), subject matter expert consultation for review of RAINN Core Program Standards for Sexual Assault Prevention and Response.

August 22 – 24, 2017, CNN Documentaries, “Destroyed: How the Trashing of Rape Kits Failed Victims and Jeopardizes Public Safety.” Subject matter expert consultation and sexual assault case reviews.

September 5, 2017, ECU STTAABLE Campus Program, Ada, OK, Webinar: “External Sexual Assault Review – Recalibrating Our Investigations.”

September 12 – 13, 2017, Citizens Against Domestic and Sexual Abuse, Island County, WA. Trauma-informed Sexual Assault Victim Interview Training and Consultation.

September 26 – 27, 2017, International Association of Chiefs of Police, Alexandria, VA. Subject matter expert consultation and webinar: “The Critical Need for Law Enforcement Agencies to Identify Gender Bias in Responses to Sexual Assault and Domestic Violence.”

October 3 – 5, 2017, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit.

2017 Consultation and Training Continued

October 18 – 27, 2017, Alaska Department of Public Safety, State Troopers, Fairbanks, Anchorage, Bethel, AK. Trauma-informed Sexual Assault Investigations consultation and training.

October 8 – 10, 2017, RTI Sexual Assault Kit Initiative (SAKI), Appleton, WI. Wisconsin Statewide SAKI training and consultation.

December 6 – 8, 2017, Baylor University Police Department, Waco, TX. Improving Sexual Assault Response and Investigations, technical assistance site visit.

2016 Consultation and Training

January 6 – 7, 2016, Goucher College, Baltimore, MD. “Trauma-informed Sexual Assault Investigations: Enhancing Campus Response,” training and consultation.

January 20, 2016, University of Massachusetts – Amherst Police Department, Amherst, MA. “Trauma-informed Sexual Assault Investigations Training: Enhancing Campus Response,” training and consultation.

January 27 – 28, 2016, International Association of Chief of Police, University of Georgia Police, Athens, GA. “Trauma-informed Sexual Assault Investigations Training.”

February 10 – 11, 2016, International Association of Chiefs of Police, Little Rock, AR. “Trauma-informed Sexual Assault Investigations Training.”

February 15 – 16, 2016, International Association of Chiefs of Police, Iowa Sexual Assault Investigators Conference, Altoona, IA. “Trauma-informed Sexual Assault Investigations Training.”

February 25, 2016, Rape Abuse and Incest National Network (RAINN), Miami, FL. Sexual assault response and investigations subject matter expert consultation.

March 3 & 4, 2016, Margolis Healy & Associates, University of Hartford, Hartford, CT. Police / Title IX, “Trauma-informed Sexual Assault Investigations: Enhancing Campus Response.”

March 10, 2016, Vermont Coalition Against Domestic and Sexual Violence, Vermont Center for Crime Victim Services, Stowe, VT. Law Enforcement and Advocacy Leadership Roundtable Consultation: Strategic Planning to Reduce Domestic and Sexual Violence Homicides in Vermont.

March 14 – 15, 2016, International Association of Chiefs of Police, Kansas Bureau of Investigations, Topeka, KS. “Trauma-informed Sexual Assault Investigations Training.”

March 17 – 18, 2016, International Association of Chiefs of Police, Kansas Bureau of Investigations, Hutchinson, KS. “Trauma-informed Sexual Assault Investigations Training.”

2016 Consultation and Training Continued

March 22 – 24, 2016, Ending Violence Against Women International Conference, Washington, DC. Plenary speaker: “Leadership and Liability on Violence Against Women Crimes.”

April 4 – 5, 2016, International Association of Chiefs of Police, Laramie, WY. “Trauma-informed Sexual Assault Investigations Training.”

April 7 – 8, 2016, International Association of Chiefs of Police, Driggs, ID. “Trauma-informed Sexual Assault Investigations Training.”

April 12 – 14, 2016, Annual International Family Justice Center Conference, San Diego, CA. Plenary speaker: “Shattering the Sexual Assault Cycle of Doubt.” Workshop presenter: “Trauma-informed Victim Interview.”

April 19, 2016, National Center for Campus Public Safety Webinar. “Sexual Assault: Courageous Conversations and Bystander Intervention.”

May 5, 2016, Connecticut Coalition Against Domestic Violence, Connecticut Police Academy, Meriden, CT. “Police Leadership in Responding to Domestic & Sexual Violence Crimes.”

May 9 – 10, 2016, International Association of Chiefs of Police, Austin, TX. “Trauma-informed Sexual Assault Training.”

May 12 – 13, 2016, International Association of Chiefs of Police, Dallas Police Department, Dallas, TX. “Trauma-informed Sexual Assault Investigations Training.”

May 16 – 20, 2016, U.S. Department of Justice Civil Rights Division, Chicago, IL. Subject matter expert consultation – police perpetrated domestic violence and sexual misconduct.

May 23 – 27, 2016, Virginia Department of Criminal Justice Services, Richmond, VA. “Trauma-Informed Sexual Assault Investigations”, training and consultation.

June - July, 2016, U.S. Department of Justice Civil Rights Division, Chicago, IL. Subject matter expert consultation – police perpetrated domestic violence and sexual misconduct.

June 1 – 2, 2016, Washington State Department of Health, Tumwater, WA. “Trauma-informed Sexual Assault Investigations Training.”

June 28 – 29, 2016, Mississippi Coalition Against Sexual Assault, Jackson, MS. Campus Law Enforcement Training Initiative: “Trauma-informed Sexual Assault Investigations Training.”

July 20 – 21, 2016, International Association of Chief of Police, Oakland Police Department, Oakland, CA. “Trauma-informed Sexual Assault Investigations Training.”

2016 Consultation and Training Continued

July 27, 2016, Battered Women's Justice Project Conference, San Diego, CA. Workshop presenter: "Leadership and Liability Lessons Learned – Domestic Violence – Sexual Assault – Stalking," "Domestic Violence Risk Assessment – A Trauma-informed Approach."

August 3 – 4, 2016, U.S. Department of Justice Office, Office on Violence Against Women / Battered Women's Justice Project, Washington, DC. Subject matter expert consultation and facilitation, "National Roundtable Discussion Preventing Gender Bias in Police Response to Sexual Assault and Domestic Violence."

August 9 – 11, 2016, Baylor University Police Department, Waco, TX. Consultation and training: "Trauma-informed Sexual Assault Response and Investigations: Enhancing Campus Response."

August 16, 2016, Vermont Police Academy, Pittsford, VT. Webinar production, Mandatory Statewide Domestic Violence Training: "Trauma-informed Victim Interview."

August 24 – 25, 2016, International Association of Chiefs of Police, University of Vermont Police Services, Burlington, VT. "Trauma-informed Sexual Assault Investigations Training."

August 30 – 31, 2016, Michigan State University, Title IX Office, East Lansing, MI. Consultation and training for campus leadership and police: "Leadership: Adopting a Trauma-informed Approach," "Trauma-informed Sexual Assault Investigations Training for Police."

September 8, 2016, East Central University STAABLE Campus Program, Ada, OK. Webinar: "Investigating Non-Fatal Strangulation Assault – A Trauma-informed Approach."

September 12 – 13, 2016, International Association of Chiefs of Police, Nashville, TN. "Trauma-informed Sexual Assault Investigations Training."

September 15 – 16, 2016, International Association of Chiefs of Police, Ithaca, NY. "Trauma-informed Sexual Assault Investigations Training."

September 24 – 25, 2016, International Association of Chiefs of Police, Canadian Armed Forces Military Police – National Investigation Service, Trenton, Ontario, Canada. "Trauma-informed Sexual Assault Investigations Training."

September 28 – 29, 2016, Poughkeepsie Police Department, Poughkeepsie, NY. "Trauma-informed Sexual Assault Investigations Training."

October 14, 2016, VOICES Campus Initiative, Symposium on Dating Violence, Sexual Assault, and Stalking, Northeastern Illinois University, Chicago, IL. Presenter: "Sexual Assault Investigations - Justice Begins with a Trauma-informed Approach," "Trauma-informed Victim Interview."

October 15 – 18, 2016, Annual International Association of Chiefs of Police Conference, San Diego, CA. Workshop presenter/moderator: Department of Justice – Identifying and Preventing Gender Bias in Police Response to Sexual Assault and Domestic Violence."

2016 Consultation and Training Continued

October 20, 2016, Nebraska Alliance of Child Advocacy Center, Bright Horizons, Ponca Tribe of Nebraska, Norfolk, NE. Training: “Trauma-informed Sexual Assault Response Training,” “Leadership for a Community Coordinated Response to Domestic and Sexual Violence.”

October 26 – 27, 2016, Forks Washington Abuse Program, Jamestown S’Klallam Tribe, Sequim, WA. “Trauma-informed Sexual Assault Investigations Training.”

November – December, 2016, U.S. Department of Justice Civil Rights Division, Chicago, IL. Subject matter expert consultation – police perpetrated domestic violence and sexual misconduct.

November 2 – 3, 2016, Vermont State Police Bureau of Criminal Investigations, Norwich, VT. “Trauma-informed Sexual Assault Investigations Training.”

November 15, 2016, Northern Kentucky University. “Trauma-informed Sexual Assault: Enhancing Campus Response.”

November 30 – December 1, 2016, RTI International Sexual Assault Kit Testing Initiative, Kansas Bureau of Investigations, Topeka, KS. “Trauma-informed Cold Case Sexual Assault Investigations.”

December 16, 2016, Police Executive Research Forum, Washington, DC. Subject matter expert / moderator for national panel; “Emerging Issues for Sexual Assault Response and Investigations.”

2015 Consultation and Training

January 12 – 16, 2015, National Center for Campus Public Safety, Berkeley, CA. “Title IX, Trauma-informed Sexual Assault Investigations and Adjudications,” training and consultation.

January 20, 2015, Connecticut Coalition Against Domestic Violence, Connecticut Police Academy, Meriden, CT. “Police Leadership for Response to Domestic Violence Crimes,” training and consultation.

January 26 - 30, 2015, Independent Monitor Site Visit, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968. Sexual Assault Case Audit / External Review Panel.

February 10 – 13, 2015, Margolis Healy & Associates, University of California Irvine. “Title IX Trauma-informed Sexual Assault Investigations,” training and consultation.

February 24 – 26, 2015, Office on Violence Against Women Campus Law Enforcement Training Institute, Arlington, VA. “Trauma-informed Sexual Assault Investigations,” training and consultation.

March 9 – 11, 2015, Margolis Healy & Associates, University of California, Oakland, CA. “Trauma-informed Sexual Assault Response and Investigations,” training and consultation.

2015 Consultation and Training Continued

March 17, 2015, New Hampshire Attorney General, University of New Hampshire School of Law, Concord, NH. “New Hampshire Criminal Justice Conference: Beyond Campus Adjudications – Improving the Criminal Justice Response to Campus Sexual Assault,” training and consultation.

March 19 – 20, 2015, Margolis Healy & Associates, Vermont State Colleges, Randolph, VT. Title IX Trauma-informed Sexual Assault Investigations,” training and consultation.

March 30 – April 1, 2015, International Association of Chiefs of Police, Dickinson College, Carlisle, PA. “Trauma-informed Sexual Assault for Police Investigators.

April 9 – 10, 2015, United States Air Force Sexual Assault Prevention and Response, Second Annual First Responders Summit, Joint Base Pearl Harbor – Hickam. Trauma-informed Sexual Assault Response, Support, and Investigations to Maximize Prosecution,” training and consultation.

April 13 – 18, 2015, National Center for Campus Public Safety, Lincoln University, Jefferson City, MO. “Title IX, Trauma-informed Sexual Assault Investigations and Adjudications,” training and consultation.

April 20 – 22, 2015, Margolis Healy & Associates, Palm Beach State College, Lakeworth, FL. Title IX Trauma-informed Sexual Assault,” training and consultation.

April 27 – 29, 2015, International Association of Chiefs of Police, Nebraska Police Academy, Grand Island, NE. Trauma-informed Sexual Assault Investigations Training.

May 1, 2015, Wyoming Sexual Assault Summit XIV, Laramie, WY. Conference presenter: Trauma-informed Sexual Assault Victim Interview, Criminal Sexual Offender Course of Conduct and Behaviors

May 4 – 8, 2015, Independent Monitor Final Site Visit, Missoula Police Department, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

May 20 – 22, 2015, University of Iowa Department of Public Safety, Iowa City, IA. Dating Violence and Co-occurring Crimes Investigations: Enhancing Campus Response.

May, 2015, Saul Ewing Law Firm, *John Doe 6 v. Pennsylvania State University, Second Mile, Gerald Sandusky* (U.S. District Court, Eastern District of Pennsylvania). Child sexual abuse litigation case review and consultation. (Defendant)

June 1 – 3, 2015, Margolis Healy & Associates, Loyola University, Baltimore, MD. Title IX Trauma-informed Sexual Assault Investigations,” training and consultation.

June 8 – 10, 2015, Margolis Healy & Associates, Brandeis University, Waltham, MA. Title IX Trauma-informed Sexual Assault Investigations,” training and consultation.

June 12, 2015, Old Dominion University, Norfolk, VA. Title IX Trauma-informed Sexual Assault Investigations,” training and consultation.

2015 Consultation and Training Continued

June 15 – 16, 2015, ECU STAABLE Campus Train the Trainer Program, Tallahassee, FL. Curriculum development consultation.

June 22 – 26, 2015, Independent Monitor Final Site Visit, University of Montana Police Department, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

July 8 – 10, 2015, International Association of Chiefs of Police, Iowa Law Enforcement Training Academy, Johnston, IA. Leadership Training on Violence Against Women Crimes.

July 17, 2015, Rutland City Police Department, Rutland, VT. Consultation and training; Leadership Training on Violence Against Women Crimes, Rutland City Police Command Staff and Supervisors.

July 21 – 22, 2015, International Association of Chiefs of Police, Louisiana State Police Training Academy, Baton Rouge LA. Trauma-informed Sexual Assault Investigations Training.

July 23 – 24, 2015, International Association of Chiefs of Police, New Orleans, LA. Trauma-informed Sexual Assault Investigations Training.

July 25, 2015, New Orleans Family Justice Center / Orleans Parish District Attorney's Office, New Orleans, LA. Training for Prosecutors; Trauma-informed Sexual Assault Investigations and Prosecutions.

July 27 – 28, 2015, International Associations of Chiefs of Police, SUNY Albany, Albany, NY. Trauma-informed Sexual Assault Training: Enhancing Campus Response.

July 30 – 31, 2015, International Associations of Chiefs of Police, SUNY Geneseo, Geneseo, NY. Trauma-informed Sexual Assault Training: Enhancing Campus Response.

August 4, 2015, College and University Police and Investigators Conference, Arlington, VA. Conference Plenary Session; "Sexual Assault: Justice Begins with a Trauma-informed Approach."

August 4, 2015, Department of Justice, Washington, DC. Consultation on Preventing Gender Bias in Police Response to Domestic Violence and Sexual Assault.

August 5 – 6, 2015, Bucknell University, Lewisburg, PA. Trauma-informed Sexual Assault: Enhancing Campus Response.

August 10 – 13, 2015, National Center for Campus Public Safety, University of Washington, Seattle, WA. Title IX, Trauma-informed Sexual Assault Investigations and Adjudications Training.

August 17 – 19, 2015, International Association of Chiefs of Police, South Bend, IN. Trauma-informed Sexual Assault Investigations Training.

August 31, 2015, Vermont Center for Crime Victims Services / Vermont Coalition Against Domestic and Sexual Violence, Waterbury, VT. Domestic and Sexual Violence Homicide Reduction Strategy for Vermont, Advisory Board.

2015 Consultation and Training Continued

September 16 – 18, 2015, International Association of Chiefs of Police, Seattle Pacific University, Seattle, WA. Trauma-informed Sexual Assault Investigations Training.

September 21 – 24, 2015, North Central College, Naperville, IL. Trauma-informed Sexual Assault Training: Enhancing Campus Response.

September 28, 2015, National Center for Campus Public Safety, Burlington, VT. Consultation for curriculum development; Title IX Trauma-informed Sexual Assault and Adjudications Training.

September 29 – October 2, 2015, Vermont Center for Crime Victims Services / Vermont Coalition Against Domestic and Sexual Violence, Stowe, VT. Domestic and Sexual Violence Homicide Reduction Strategy: Advocacy Leadership Institute.

October 6 – 8, 2015, International Association of Chiefs of Police, Illinois State University, Norman, IL. Trauma-informed Sexual Assault Investigations Training.

October 13 – 15, 2015, Winona State University, Winona, MN. Trauma-informed Sexual Assault Training: Enhancing Campus Response.

October 19, 2015, Pennsylvania Coalition Against Rape, Carlisle, PA. Trauma-informed Sexual Assault Response Training.

October 22 – 23, 2015, ARC of Aurora / Aurora Colorado Police, Aurora, CO. Consultation and training; Trauma-informed Sexual Assault Training for Victims with Disabilities.

October 25 – 26, 2015, International Association of Chiefs of Police Conference, Chicago, IL. Leadership on Violence Against Women Peer to Peer Session; Panel Moderator for Missoula, Montana: A Case Study in Reforming the Law Enforcement Response to Sexual Assault.

November 11 – 13, 2015, University of Fairbanks, Fairbanks, AK. Consultation and training; Trauma-informed Sexual Assault Investigations.

November 15 – 17, 2015, International Association of Chiefs of Police, Juneau, AK. Trauma-informed Sexual Assault Investigations Training.

November 18 – 20, 2015, International Association of Chiefs of Police, Anchorage, AK. Trauma-informed Sexual Assault Investigations Training.

December 1, 2015, Harvard University, Cambridge, MA. Consultation and training; Title IX Trauma-informed Investigations, presentation to Harvard University Community “Sexual Assault Courageous Conversations Required.”

December 6 – 11, 2015, National Center for Campus Public Safety, Scottsdale, AZ. Title IX, Trauma-informed Sexual Assault Investigations and Adjudications Train the Trainer Program.

December 15, 2015, Department of Justice, Office on Violence Against Women, Washington DC. U.S. Attorney General Loretta Lynch announcement for Preventing Gender Bias in Police Response to Sexual Assault and Domestic Violence. Panel Moderator for subject matter experts on Attorney General Lynch’s / DOJ announcement.

2015 Consultation and Training Continued

December 15, 2015, SURVJUSTICE, Washington, DC. Consultation and book interview.

December 17, 2015, International Association of Chiefs of Police, Alexandria, VA. Consultation and curriculum review for National Law Enforcement Leadership Initiative on Violence Against Women.

2014 Consultation and Training

January 7 – May 15, 2014, Rape Abuse and Incest National Network (RAINN), Washington DC / Miami, FL. Review of safety and security policies, procedures and training related to child sexual abuse and adult sexual assault response and investigations consultation.

January 12 – 15, 2014, Margolis Healy & Associates, Virginia Tech, Blacksburg, VA. Sexual Assault and Title IX Investigations assessment and consultation.

January 27 – 31, 2014, University of Iowa, Iowa City, IA. Trauma-informed Sexual Assault and Stalking Investigations on Campus.

February 3 -7, 2014, Independent Monitor Site Visit, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

February 18 – 20, 2014, Margolis Healy & Associates, College of Charleston, Charleston, SC. Trauma-informed Sexual Assault / Title IX Investigations for police and Title IX Investigators.

February – April, 2014, International Association of Chiefs of Police, Alexandria, VA. Consultation for development of National Law Enforcement Model Policy for Sexual Assault Response and Investigations.

March 2014, Michigan Domestic and Sexual Violence Prevention and Treatment Board, Prosecuting Attorneys Association of Michigan. Advisor and narrator for development of OVW funded training video: *“Sexual Assault: A Trauma-informed Approach to Law Enforcement First Response”*

March 22 – 27, 2014, International Association of Chiefs of Police, Ohio Leadership Institute on Violence Against Women, Columbus, OH. Faculty member responsible for participation in four day training institute for law enforcement leaders on domestic violence, sexual assault, stalking and human trafficking.

April 17, 2014, New Hampshire Attorney General’s Office and the New Hampshire National Guard, Sexual Assault Resource Team (SART) Summit, Concord, NH. “Overcoming the Complexities of Sexual Violence: Trauma-informed Response, National Best Practices and Lessons Learned”

2014 Consultation and Training Continued

May 13 – 15, 2014, Margolis Healy & Associates, Marymount University, Arlington, VA. “Trauma-informed Sexual Assault / Title IX Investigations for Police and Title IX Investigators.”

June 21 – 26, 2014, International Association of Chiefs of Police, Vermont Leadership Institute on Violence Against Women, Burlington, VT. Organizer and lead faculty member responsible for four-day training institute for law enforcement leaders on domestic violence, sexual assault, stalking and human trafficking.

July 9 – 12, 2014, Independent Monitor Site Visit, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968. Sexual Assault Case Audit / External Review Panel.

July 15 - 16, 2014, Rape Abuse and Incest National Network (RAINN), Washington DC / Miami, FL. Training project for RAINN client: “Trauma-informed Sexual Assault Response Training”

July 20 – 25, 2014, International Association of Chiefs of Police, Illinois Leadership Institute on Violence Against Women, Fairview, IL. Faculty member responsible for participation in four-day training institute for law enforcement leaders on domestic violence, sexual assault, stalking and human trafficking.

August 3 – 8, 2014, Independent Monitor Site Visit, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968. Compliance visit.

August 23 – 27, 2014, International Association of Chiefs of Police National Law Enforcement Institute on Violence Against Women, Kansas City, MO. Faculty member responsible for participation in four-day training institute for law enforcement leaders on domestic violence, sexual assault, stalking and human trafficking.

September 9 – 11, 2014, Margolis Healy & Associates, Virginia Tech, Blacksburg, VA. Trauma-informed Sexual Assault and Title IX Investigations Training and consultation.

September 15 – 16, 2014, Rape Abuse and Incest National Network (RAINN), Washington DC / Fort Lauderdale, FL. Training project for RAINN client: “Trauma-informed Sexual Assault Response Training”

September 17, 2014, National Center for Victims of Crime, National Training Institute, Miami, FL. Workshop presentation: “Justice Begins with a Trauma-informed Approach.”

September 23 – 24, 2014, Oklahoma Attorney General Partners for Change Conference on Domestic and Sexual Violence, Norman, OK. Opening plenary, “Sexual Assault: Justice Begins with a Trauma-informed Approach.” Workshop presentation, “Sexual Assault: Trauma-informed First Response.”

2014 Consultation and Training Continued

October 2, 2014, Vermont Center for Crime Victim Services and the Vermont Coalition Against Domestic and Sexual Violence, OVW Grant Award Project. Consultation for the development of the Vermont Leadership Institute on Violence Against Women Crimes and statewide strategic plan to reduce domestic and sexual violence homicides.

October 6 – 8, 2014, ECU STTAABLE Campus Program, Gallaudet University, Department of Public Safety, Washington DC. Trauma-informed Sexual Assault Investigations Training

October 23 – 28, International Association of Chiefs of Police First Line Supervisor Institute on Violence Against Women, Orlando, FL. Domestic Assault, Sexual Assault, Stalking, and Human Trafficking.

October 27, 2014, International Association of Chiefs of Police Annual Conference, Orlando, FL. Conference Presenter: “Executive Leadership and Liability Prevention: Domestic and Sexual Assault.”

October 28, 2014, International Association of Chiefs of Police Annual Conference, Orlando, FL. Conference Facilitator: Domestic Violence and Firearms.

October 29 – 30, 2014, Virginia Attorney General Campus Sexual Assault Summit, Richmond, VA. Trauma-informed Sexual Assault Response and Victim Interview for Title IX Investigators, Plenary “Justice Begins with a Trauma-informed Response to Sexual Assault.”

November 3 – 5, 2014, International Association of Chiefs of Police, East Hartford, CT. Trauma-informed Sexual Assault Investigations Training for Police Investigators.

November 10 – 14, 2014, National Center for Campus Public Safety, Richmond, VA. Title IX, Trauma-informed Sexual Assault Investigations and Adjudications Training.

November 19 – 20, 2014, Commission on Accreditation in Law Enforcement Annual Conference, Albuquerque, NM. Workshop presentation and consultation: “Early Warning and Prevention: Police Perpetrated Domestic Violence and Sexual Misconduct.”

December 4 – 5, 2014, National Justice Center Alliance, New Orleans Best Practices Conference, New Orleans, LA. Plenary, “Justice Begins with a Trauma-informed Approach.” Consultation and training, Sexual Assault Victim Interview and Demonstration.

December 8 – 12, 2014, Independent Monitor Site Visit, Missoula, MT. Department of Justice Agreements / DOJ investigations for unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968. Compliance visit.

2013 Consultation and Training

January 4 – March 14, 2013, Law Office of McNeil, Leddy & Sheahan, Burlington, VT. Law Enforcement Management and Personnel Consultation.

January 20 – 26, February 4-5, 2013, Margolis Healy & Associates, Citadel Military College of South Carolina, Charleston, SC. Child Sexual Abuse Response and Investigation Consultation.

February 24 – 25, 2013, International Association of Chiefs of Police / Illinois Law Enforcement Leadership Institute on Violence Against Women, Oak Brook, IL. Curriculum review and preparation for Illinois Leadership Institute on Violence Against Women.

February 28, April 2, April 18, 2013, Vermont Department of States Attorneys Special Investigation Units Grant Program, Vermont Center for Crime Victims Services. Vermont regional training South Burlington, Montpelier and White River; “Overcoming the Complexities of Sexual Violence; Trauma-informed Response – National Best Practices – Lessons Learned.”

March 17 – 22, 2013, International Association of Chiefs of Police / Illinois Law Enforcement Leadership Institute on Violence Against Women, Oak Brook, IL. Faculty member responsible for participation in four day curriculum for law enforcement leaders to address domestic violence, sexual assault, stalking and human trafficking.

March 27 – 30, 2013, International Association of Chiefs of Police, Castle Rock, Colorado. Colorado Law Enforcement Violence Against Women Leadership Summit; Domestic Violence, Trauma-informed Response to Sexual Assault and Stalking.

April 8 – 9, 2013, Texas Association Against Sexual Assault, Dallas, Texas. University Police Sexual Assault Trauma-informed Response and Investigations Training. Texas University Police agencies.

April 22 – 26, 2013, International Association of Chiefs of Police / Illinois Law Enforcement Leadership Institute on Violence Against Women, East Peoria, IL. Faculty member responsible for participation in four-day curriculum for law enforcement leaders to address domestic violence, sexual assault, stalking, and human trafficking.

May 1- 2, 2013, Old Dominion University Police, Norfolk, VA. Sexual Assault Trauma-informed Response and Investigations Training for university, local and county police.

May 14 - 17, 2013, International Association of Chiefs of Police / North Dakota Council on Abused Women’s Services, Minot and Stanley, ND. Leadership Summit on Sexual Assault; training for the statewide model policy for multi-disciplinary sexual assault response and investigation.

May 19 – May 22, 2013, Margolis Healy & Associates, Swarthmore College, PA. Sexual Assault and Title IX Investigations assessment and consultation.

May 23, 2013, National Football League (NFL) Headquarters, New York City, NY. Teleconference Consultation; Engaging Men in Violence Against Women Prevention and Leadership.

2013 Consultation and Training Continued

June 2013 – June 2015, U.S. Department of Justice, Missoula Police Department, Missoula, MT Agreement, Independent Monitor. Agreement to resolve findings regarding unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

June 2013 – June 2015, U.S. Department of Justice, University of Montana Police Department, Missoula, MT, Independent Monitor. Agreement to resolve findings regarding unlawful gender discrimination in violation of the Violent Crime Control and Law Enforcement Act of 1994, and the anti-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968.

June 16 – 17, 2013, International Association of Chiefs of Police, Alexandria, VA. Curriculum development for two-day national training on Trauma-informed Response to Sexual Assault.

June 19 – 20, 2013, Michigan Domestic Violence and Sexual Assault Prevention and Treatment Board, Lansing, MI. Statewide Criminal Justice Summit on Sexual Assault – Statewide Sexual Assault Response and Investigations assessment, policy development meeting, and consultation.

July 2, 2013, U.S. Air Force Sexual Assault Prevention and Response Command, Pentagon, Major General Margaret Woodward. Leadership for Sexual Assault Prevention telephone consultation.

August 5 – 8, 2013, Missoula Police Department and University of Montana Office of Public Safety, Missoula, MT. Sexual Assault Trauma-informed Response and Investigations Training.

September 7 – 12, 2013, International Association of Chiefs of Police National Law Enforcement Leadership Institute on Violence Against Women, Savannah, GA. Faculty member responsible for participation in four-day curriculum for law enforcement leaders from around the country to address domestic violence, sexual assault, stalking, and human trafficking.

September 17 – 20, 2013, Missoula Police Department and University of Montana Office of Public Safety, Missoula, MT. Sexual Assault Trauma-informed Response Training for First Responders.

October 1, 2013, Nebraska State Patrol, Crimes of Power and Control Statewide Conference, Lincoln, NE. Keynote address: “Justice Starts with a Trauma-informed Response to Sexual Assault.”

October 3 – 4, 2013, Michigan Domestic Violence and Sexual Assault Treatment Board, Petoskey, MI. Sexual Assault Response and Investigations Training / Consult for the development of a Law Enforcement Training Video; Trauma-informed Response to Sexual Assault.

October 7 – 8, 2013, U.S. Air Force Sexual Assault Prevention and Response Summit, Andrews Air Force Base. Consultation and presentation requested on Leadership, Prevention, and the Prioritization of Violence Against Women Crimes. (Rescheduled)

October 10 – 11, 2013, ARC of Aurora Colorado, Statewide Conference, Balancing the Scales of Justice for Children and Adults with Disabilities. Keynote Address: “Justice Starts with a Trauma-Informed Response to Sexual Assault.”

October 16 – 18, 2013, Margolis Healy & Associates, Swarthmore College, PA. Sexual Assault Response and Investigations Training, Trauma-informed Response, and Title IX Responsibilities.

2013 Consultation and Training Continued

November 15, 2013, Vermont National Guard Sexual Assault Prevention and Response Summit, Northfield, VT. Training: “Leadership, Prevention, and the Prioritization of Violence Against Women Crimes” / “Justice Starts with a Trauma-informed Response to Sexual Assault.”

October 2013 – October 2016, Vermont Center for Crime Victim Services and the Vermont Coalition Against Domestic and Sexual Violence, OVW Grant Award Project. Project for the development of the Vermont Leadership Institute on Violence Against Women Crimes and statewide strategic plan to reduce domestic and sexual violence homicides.

December 1 – 13, 2013, Criminal Justice Planning Agency, Commonwealth of Northern Mariana Islands - Saipan. Law Enforcement Leadership Training and Consult on Violence Against Women Crimes Prevention, Response and Investigations / Multi-Disciplinary Sexual Assault Trauma-informed Response and Investigations Training / Sexual Assault Response Team Consultation.

2012 Consultation and Training

January – April, 2012, Law Office of McNeil, Leddy & Sheahan, Burlington, VT. Law Enforcement Management and Personnel Consultation.

January, 2012, Margolis Healy & Associates, Curriculum Development, Sexual Assault Investigations. Development of two-day Sexual Assault Investigation curriculum for campus Title IX Investigators, Student/Judicial Conduct Boards.

February 14, 2012, Margolis Healy & Associates / State University of New York (SUNY). Live webinar and consultation for statewide SUNY Title IX Coordinators and Investigators titled “Sexual Assault Investigations on Campus.”

March 5 - 9, 2012, International Association of Chiefs of Police & Minnesota Police Chiefs Association Domestic Violence Leadership Summit; Winona, Marshall, Moorhead, Duluth, MN. Training and leadership summit for Minnesota Chiefs and Sheriffs on Domestic Violence Prevention and Response with Mark Wynn.

March 22 – 23, 2012, Michigan Domestic Violence and Sexual Assault Prevention and Treatment Board, Lansing, MI. “Statewide Criminal Justice Summit on Sexual Assault.” Presentations: “Leadership - Overcoming the Complexities of Sexual Violence;” “Sexual Assault Investigations and the Consent Defense;” and “Working with the Media in the Wake of a High-Profile Violence Against Women Crime.” Consultation during 2012 Sexual Assault Statewide Task Force Meeting.

April 9 – 13, 2012, Margolis Healy & Associates / University of Michigan. Public Safety management and leadership consult.

April 17, 2012, International Association of Chiefs of Police, Alexandria, VA. “National Law Enforcement Leadership Initiative on Violence Against Women.” Curriculum development meeting and preparation for: “First Line Supervisors Leadership Training on Violence Against Women.”

2012 Consultation and Training Continued

April – May, 2012, Law Office of McNeil, Leddy & Sheahan, Burlington, VT. search and seizure / police supervision litigation case review and consultation. (Defendant)

May 7 – 11, 2012, Rutland City Police Department, Rutland, VT. Law Enforcement Management and Policy Consultation

May 19 – 24, 2012, International Association of Chiefs of Police, Philadelphia, PA. National Law Enforcement Leadership Initiative on Violence Against Women - First Line Supervisors Leadership Training on Violence Against Women.

June 4, 2012, Vermont Center For Crime Victims Services, Montpelier, VT. Keynote speech for Courage in Bloom Memorial Garden for Crime Victims.

June 19 – 20, 2012, Oklahoma Coalition Against Domestic and Sexual Violence Statewide Conference, Tulsa, OK. Keynote address; “Leadership and Prioritization of Violence Against Women Crimes.” Training presentations: “Avoiding Dual Arrest – Predominant Aggressor Determination;” “Working with the Media – Lessons Learned.”

June 22, 2012, “UMBRELLA” Domestic and Sexual Violence Advocacy, St. Johnsbury, VT. Domestic Violence Leadership, Prevention and Fatality Reduction – Community Forum.

June 26, 2012, Vermont Public Radio, Colchester, VT. Law Enforcement Use of Electronic Control Devices (Taser).

July 3 – December 8, 2012, Commonwealth of Northern Mariana Islands / “ALSO” Chicago, IL. Consultation and Training for the development of a multi-disciplinary sexual assault response and investigations training for the Northern Mariana Islands Department of Public Safety.

July 11, 2012, Margolis Healy & Associates, Middlebury College, Middlebury, VT. Sexual Assault Investigations training.

July 29 – August 1, 2012, Margolis Healy & Associates, Stony Brook University, NY. Sexual Assault Investigations and Title IX Assessment.

August 5 – August 11, 2012, International Association of Chiefs of Police / Ohio Police Chiefs and Sheriffs Association, Centerville, Athens, Perrysburg and Richfield, Ohio. Ohio Leadership Summit on Violence Against Women Crimes: Domestic Violence – Sexual Assault, with Mark Wynn.

August 20 – 24, 2012, International Association of Chiefs of Police / North Dakota Council on Abused Women’s Services, Casselton and Bismarck, ND. Leadership Summit on Sexual Assault; training for the development of a statewide model policy for multi-disciplinary sexual assault response and investigation.

August 31, 2012, Margolis Healy & Associates, Middlebury College, VT. Sexual Assault Investigations training; victim and suspect interviews and case studies.

2012 Consultation and Training Continued

September 9 – 11, 2012, International Association of Chiefs of Police / Michigan Domestic Violence and Sexual Assault Treatment Board / Prosecuting Attorneys Association of Michigan, Pontiac, MI. Leadership Summit on Sexual Assault Investigations and multi-disciplinary policy development for Detroit, Flint, Saginaw, and Pontiac, MI.

September 24, 2012, New England Tri-State Advanced Victim Assistance Academy, U.S. Attorney's Office District of Vermont / Maine and New Hampshire. Leadership and Prioritization of Violence Against Women Crimes: Domestic Violence – Stalking – Sexual Assault – Human Trafficking.

November, 2012, Law Offices of Clark, Werner & Flynn P.C., Burlington, VT. Child sexual abuse / public safety litigation case review and consultation. (Plaintiff)

December 3 – 8, 2012, Commonwealth of Northern Mariana Islands / “ALSO” Chicago, IL. Five-day on-site Consultation and Training, Saipan, Northern Mariana Islands for the development of a multi-disciplinary sexual assault response team and sexual assault investigations training.

2011 Consultation and Training

January – March, 2011, Law Office of McNeil, Leddy & Sheahan, Burlington, VT. Law Enforcement Management and Personnel Litigation Consultation.

January 11, 2011, Lake Champlain Chamber of Commerce, Burlington, VT. “Leadership Champlain Program: Panel for community leaders “Challenges of Law Enforcement Leadership.”

February 23-24, International Association of Chiefs of Police, Seattle, WA. “National Law Enforcement Leadership Initiative on Violence Against Women. Curriculum development meeting: “First Line Supervisor Leadership Training on Violence Against Women.

March 2, 2011, International Association of Chiefs of Police, Alexandria, VA. “National Law Enforcement Leadership Institute on Violence Against Women. Curriculum development for “Law Enforcement Leadership and Accountability.”

March 24 – 25, 2011, U.S. Department of Education, Office for Civil Rights, Boston MA. “Title IX and Sexual Assault: Exploring New Paradigms for Prevention and Response.” Two presentations and consultations: “Responding to Reports of Sexual Assault,” and “Sexual Assault Investigations.”

March 31, 2011, Margolis Healy & Associates, Richmond, VT. Live national webinar presentation for NASPA Student Affairs Administrators titled: “Nature of Violence Against Women Crimes on Campus; Intimate Partner Violence, Sexual Assault, Stalking.”

April 11, 2011, International Association of Chiefs of Police, Alexandria, VA. “National Law Enforcement Leadership Institute on Violence Against Women;” curriculum development.

April 28, 2011, Margolis Healy & Associates, Richmond, VT. Live national webinar presentation for NASPA Student Affairs Administrators titled: “Investigation of Violence Against Women Crimes on Campus; Intimate Partner Violence, Sexual Assault, Stalking.”

2011 Consultation and Training Continued

May 15-18, 2011, International Association of Chiefs of Police, Kansas City MO. “National Law Enforcement Leadership Institute on Violence Against Women.” Faculty member responsible for participation in four-day curriculum for law enforcement leaders to address domestic violence, sexual assault, stalking and human trafficking.

June 8-9, 2011, University at Albany SUNY, University Counseling Center, Albany NY. 2nd annual regional conference for campus and community. “Broadening the Lens: Responding to Sexual Violence on College Campuses.” Conference Keynote address and consultations: “Overcoming the Complexities of Sexual Violence: Leadership – Prevention – Justice.”

June 22 - 23, 2011, Oklahoma Coalition Against Domestic and Sexual Violence, Tulsa, OK. Annual Conference: “Developing Community-Based Collaborations.” Two presentations and consultations: “Sexual Assault; The Importance of a Multi-Disciplinary Approach,” and “Investigative Challenges of Non-Stranger Rape.”

August 23 - 24, 2011, Harvard University, Administrative Board, Cambridge, MA. Presentations and consultations with Dr. David Lisak on “Understanding Sexual Violence; Victim Trauma and Offender Behavior.”

October 5, 2011, International Association of Chiefs of Police, Alexandria, VA. “National Law Enforcement Leadership Initiative on Violence Against Women.” Curriculum development meeting: “First Line Supervisor Leadership Training on Violence Against Women.”

October 10 - 14, 2011, Margolis Healy & Associates / Yale University Police, New Haven, CT. Week long curriculum for all Yale University Police Officers; “Investigating Sexual Assault, Stalking and Intimate Partner Violence,” and “Police Leadership and Accountability for Violence Against Women Crimes.”

November 9 - 10, 2011, Margolis Healy & Associates / Title IX Conference, Philadelphia, PA. “Title IX Sexual Violence Response Compliance.” Presentations and consulting: “Understanding Sexual and Gender Violence,” and “Sexual Assault Case Study.”

December 9, 2011, Vermont Police Academy, Pittsford, VT. “Vermont Law Enforcement Leadership Summit on Domestic and Sexual Violence.” Presentations include, “Leadership, Liability and Prioritization of Violence Against Women Crimes,” “Trauma-informed Response to Sexual Assault,” and “Violence Against Women Prevention and Response Policy Development and Case Studies.”

EXHIBIT B MATERIALS CONSIDERED

Uber Online Documentation:

Uber Website, emphasis on safety information, various dates, and press release.

Uber Mobile application, emphasis on safety information, various dates.

Uber 2017 – 2018 Safety Report (84 pages)

Uber 2019 – 2020 Safety Report (78 pages)

Uber 2021 – 2022 Safety Report (33 pages)

Uber Documents⁹⁵:

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⁹⁵ In addition to the materials cited herein, I also incorporate the documents cited throughout this Report.

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Depositions:

Greg Brown 5/07/2025 Deposition and exhibits

Greg Brown 7/15/2025 30(b)(6) MDL Deposition and exhibits

Greg Brown 7/16/2025 30(b)(6) MDL Deposition and exhibits

Greg Brown 8/25/2025 Deposition and exhibits

Greg Brown 8/26/2025 Deposition and exhibits

Gus Fuldner 3/26/2025 Vol. I Deposition and exhibits

Gus Fuldner 3/27/2025 Vol. II MDL Deposition and exhibits

Hannah Niles 5/29/2025 MDL Deposition and exhibits

Hannah Niles 6/30/2025 MDL 30(b)(6) Deposition and exhibits

Hannah Nilles 7/10/2025 MDL Deposition and exhibits

Hannah Nilles 7/23/2025 Deposition and exhibits

Hannah Nilles 8/07/2025 Deposition and exhibits

Jenny Luu 2/27/2025 MDL Deposition and exhibits

Mariana Correa Esteves 7/15/2025 Deposition and exhibits

Mariana Correa Esteves 8/28/2025 30(b)(6) Deposition and exhibits

Rebecca Payne 4/02/2025 Vol I. Deposition and exhibits

Rebecca Payne 5/15/2025 Vol. IV Deposition and exhibits

Sunny Wong 4/16/2025 Deposition and exhibits

Sunny Wong 6/25/2025 Deposition and exhibits

Sunny Wong 7/23/2025 Deposition and exhibits

Tracy Breeden 3/13/2025 MDL Deposition and exhibits

Other:

HIGHLY CONFIDENTIAL - Incident Report Classification of Dominant Tickets for 2017-2024
Flack Incident Report Classification

Case-Specific Materials: As listed in Schedule A

BIBLIOGRAPHY / GUIDING DOCUMENTS

Sexual Assault:

International Association of Chiefs of Police: Sexual Assault Response Policy and Training Content Guidelines. <https://www.theiacp.org/resources/sexual-assault-response-policy-and-training-content-guidelines>

Sexual Assault Incident Reports; Investigative Strategies. <https://www.theiacp.org/resources/fact-sheetbriefresourcetool/sexual-assault-incident-reports-investigative-strategies>

Sexual Assault: Successful Trauma-Informed Victim Interviewing. <https://www.theiacp.org/resources/document/successful-trauma-informed-victim-interviewing>

Bringing Sexual Assault Offenders to Justice, National Training Video. <https://www.theiacp.org/resources/video/bringing-sexual-assault-offenders-to-justice-roll-call-training-video>

Sexual Assault Supplemental Report Form. <https://www.theiacp.org/resources/document/sexual-assault-supplemental-report-form>

Addressing Sexual Offenses and Misconduct by Law Enforcement Executive Guide. <https://www.theiacp.org/resources/document/addressing-sexual-offenses-and-misconduct-by-law-enforcement-executive-guide>

Co-authored End Violence Against Women International, Model Policy Resource: Law Enforcement Sexual Misconduct Prevention and Accountability. https://evawintl.org/wp-content/uploads/2024-06_TB-Model-Policy-Resource-LESM-Prevention-and-Accountability.pdf#:~:text=In%202022%2C%20when%20Congress%20passed,officers%20who%20commit%20sexual%20misconduct.

U.S. Department of Justice, Civil Rights Divisions and Office on Violence Against Women, Improving Law Enforcement Response to Sexual Assault and Domestic Violence by Identifying and Preventing Gender Bias. <https://www.justice.gov/ovw/law-enforcement-guidance>

PUBLIC SAFETY / CRIME PREVENTION

Crime Prevention Triangle, numerous sources and variations throughout my career. Community-Oriented Policing: U.S. Department of Justice, Bureau of Justice Assistance, Understanding Community Policing: A Framework for Action, 1994. <https://www.ojp.gov/pdffiles/commpp.pdf>

Community-Oriented Policing: U.S. Department of Justice, Community Oriented Policing Services. <https://www.justice.gov/doj/office-community-oriented-policing-services>

Community-Oriented Policing: International Association of Chiefs of Police, Community-Oriented Policing. <https://www.theiacp.org/topics/community-oriented-policing>

Problem Oriented Policing / SARA Problem Solving Model: U.S. Department of Justice, National Institute of Justice, Problem Oriented Policing, JAN 1987.

<https://www.ojp.gov/pdffiles1/Digitization/102371NCJRS.pdf>

Arizona State University, Center for Problem Oriented Policing.

<https://popcenter.asu.edu/content/problem-analysis-triangle-0>

Crime Prevention: American Crime Prevention Institute, <https://www.acpionline.com/>

Crime Prevention Through Environmental Design: International Crime Prevention Through Environment Design Association, <https://www.cpted.net/>

Data Driven Approaches to Policing: International Association of Directors of Law Enforcement Standards and Training, Data Driven Approaches to Crime and Traffic Safety.

<https://www.iadlest.org/training/ddacts/training>

21st Century Policing Initiative: U.S Department of Justice, Office of Justice Program, Final Report of the President's Task on 21st Century Policing. <https://www.ojp.gov/ncjrs/virtual-library/abstracts/final-report-presidents-task-force-21st-century-policing>

21st Century Policing: International Association of Chiefs of Police, 21st Century Policing Blueprint. <https://www.ojp.gov/ncjrs/virtual-library/abstracts/final-report-presidents-task-force-21st-century-policing>

Exhibit C: List of Prior Testimony During Past Four Years Previous Litigation Consultation

Not Applicable

Exhibit D

Statement of Compensation

My hourly rate for this engagement is \$475 for review and analysis, and \$525 for deposition or trial testimony.